

City of Arts & Innovation

COMMUNITY & ECONOMIC DEVELOPMENT DEPARTMENT Planning Division

Draft Initial Study

WARD: 1

- 1. Case Numbers:** P18-0091(GP), P18-0092(RZ), P18-0093(PPE), P18-0094(CUP), P18-0095(CUP), P18-0096(CUP), P18-0097(CUP), P18-0098(CUP), P18-0099(TPM), P18-0100(MCUP), P18-0101(DR), P18-0424 (GE), P18-0401 (EIR)
- 2. Project Title:** The Exchange
- 3. Lead Agency:** City of Riverside
Community & Economic Development Department
Planning Division
3900 Main Street, 3rd Floor
Riverside, CA 92522
- 4. Contact Person:** Brian Norton, Senior Planner, (951) 826-2308
- 5. Project Location:** The approximately 35.4 acre project site is located in the northwestern section of the City of Riverside, and is generally bounded by Orange Street to the west, Strong Street to the north, State Route 60 to the south and Interstate 215 to the east. The project site is comprised of the following eight parcels: 209-020-047, 209-020-048, 206-151-036, 209-060-026, 209-060-022, 209-070-014, 209-070-009, and 206-151-029. Figure 1 shows the project location in a regional context, and Figure 2 shows the project site in its local context.
- 6. Project Applicant/Project Sponsor's Name and Address:** AFG, LLC
c/o Jim Guthrie
1451 Research Park Drive, Suite 200
Riverside, California 92507-2154
- 7. General Plan Designation:** O - Office, MDR - Medium Density Residential
- 8. Zoning Designation:** R-1-7000 - Single Family Residential, R-3-1500 - Multiple Family Residential, R-1-7000-WC - Single Family Residential and Water Course Overlay
- 9. Description of Project:**

The approximately 35.4 acre project site is located in the northwestern section of the City of Riverside, and is generally bounded by Orange Street to the west, Strong Street to the north, State Route 60 to the south and Interstate 215 to the east. The project site is comprised of the following eight parcels: 209-020-047, 209-020-048, 206-151-036, 209-060-026, 209-060-022, 209-070-014, 209-070-009, and 206-151-029. Figure 1 shows the project location in a regional context, and Figure 2 shows the project site in its local context. The project site currently has a General Plan land use designation of O - Office and MDR - Medium Density Residential, and Zoning designations of R-1-7000 - Single Family Residential, R-3-1500 - Multiple Family Residential, and R-1-7000-WC - Single Family Residential and Water Course Overlay.

Project Site Background:

The Cultural Resources Study conducted by Rincon Consultants, Inc. (2018), indicates investors from the Southern California Colony Association, solicited by John W. North, laid out a mile-square town site in 1870. The town which

was originally called Jurupa, was changed to Riverside in 1871. In 1877, construction started on the Lower Canal, which traversed the project site until it was abandoned in 1914. On-site field investigations have not identified any physical remnants of the canal on the project site.

Land uses in the project vicinity were largely rural through the 19th and early 20th centuries with a mixture of ranches, orchards, and rural homesteads. Residential development within the vicinity of the project site began in the early 1900s with construction of several homes along Strong and Orange Streets. Single family residences were constructed on the project site in the 1920s along Vista Street, which no longer exists. All of homes on the project site were demolished by the late 1980's. Prior to demolition of the residences, structures were found ineligible for listing in the NRHP and CRHR due to a lack of integrity and historical association. Remnants of residences remain on-site and include a series of joined concrete walls, concrete posts, railing, and retaining walls.

The University Wash/Thornton Storm Drain that traverses the project site from east to west was constructed around 1980 and completed in 1981 by the Riverside County Flood Control and Water Conservation District. It is still in operation under the control of Riverside County Flood Control and Water Conservation District.

Three freeways currently converge at the southeast corner of the subject property: California State Route 60 (SR 60), California State Route 91 (SR 91), and Interstate 215 (I-215). SR 60 designated as the Pomona Freeway, runs along the southern boundary of the subject property. SR 91, which runs south from the southeasterly boundary of the site, was constructed between 1963 and 1975, with the addition of car pool lanes in 1995. I-215, which also runs along a portion of the easterly boundary of the project site, was originally constructed as U.S. 395. In 1982, construction began along this stretch of U.S. 395 and it was subsequently re-designated I-215.

The Riverside Interchange, comprised of the convergence of I-215, SR-60 and SR-91, was constructed in the late 1950's as a cloverleaf interchange design. The interchange underwent a \$317 million upgrade, completed in 2008. Reconstruction replaced the loop ramps which previously joined I-215 north with SR 91 south and the I-215 southbound with the SR 60 east. Construction included widening five miles of the intersecting freeways and reconstructing eleven vehicular bridges.

Proposed Development:

The proposed mixed-use project consists of multi-family residential dwelling units, multi-tenant commercial buildings, a vehicle fueling station, a drive-thru restaurant, two hotels, a Recreational Vehicle (RV) overnight parking component, space for intermittent outdoor entertainment and on-site activities (e.g. farmers market, car shows). The residential portion of the project would be constructed on approximately 18.4 acres on the northern half of the project site. The commercial/retail, vehicle fueling station and drive-thru restaurant portion of the project would be located on approximately 7.6 acres located in the southwest corner of the project site. Two hotel buildings with associated parking would be located on approximately 7.4 acres, near the southeast corner of the project site. The proposed RV Parking is located in the southeast corner of the project site, closest to the I-215/SR 60 interchange and adjacent to the proposed hotels. Development of the proposed project would involve site clearing, rough grading and compaction, pouring of concrete and asphalt, and construction of the proposed structures.

Vehicular access to the project site would be provided by one driveway entrance located east of the site along La Cadena Drive, and two driveways located along the northwest boundary of the site on Orange Street. Residents would primarily access the site through the entrances located at La Cadena Drive and the northern-most driveway along Orange Street; retail customers and hotel visitors would primarily access the site through the driveways along Orange Street. The retail areas would generally operate 12 to 15 hours a day, with the exception of the proposed gas station, which would operate 24 hours a day. The hotels and RV Parking would operate 24 hours a day. The proposed site plan is shown in Figure 3.

Residential Component:

The residential component of the site is located on approximately 18.4 acres, on the northern portion of the site and includes a total of 482 one-, two-, and three-bedroom residential apartment units in 21 three-story buildings. Project plans provide 479,773 square feet of residential space, resulting in a density of 26.2 dwelling units per acre, and an average unit size of 995 square feet. All residential units would be provided at market rate. The residential component of the development incorporates a number of amenities, including live-work units, two fitness centers, two clubhouses, two outdoor pool areas, and a resident-use-only dog park.

Of the 482 units, 157 residential units would be one-bedroom, one-bathroom, ranging in size from 710 to 796 square feet. Ten of the one-bedroom, one-bathroom units would be dedicated live/work units. 308 residential units would be two-bedroom, two-bathroom, ranging in size from 1,015 to 1,159 square feet. The remaining 17 residential units would

be 3-bedroom, 2-bathroom, and approximately 1,297 square feet in size. **Error! Reference source not found.** provides dwelling unit details.

Table 1 Residential Unit Details

Unit Types	Number of Units	Percentage of Total Unit Count	Unit Size
1-bedroom	157	33 percent	710 to 796 sq. ft.
2-bedroom	308	64 percent	1,015 to 1,159 sq. ft.
3-bedroom	17	4 percent	1,297 sq. ft.
Total	482	100 percent	Avg: 995 sq. ft.

Residential Parking Component:

Per the City of Riverside Off-Street Parking and Loading Zoning Standards, residential developments require 1.0 to 2.0 parking spaces per unit, depending on the number of proposed bedrooms. A total of 886 parking spaces are required for the residential component of the project. In addition, Zoning regulations require 75 percent of the total required spaces be covered (i.e., in a garage or carport). The residential parking areas would be accessed by three gated vehicle entry points.

The project proposes to park the residential portion of the project with 167 standard open parking stalls, 24 diagonal open stalls, 6 handicap accessible open stalls, 346 standard covered carports, 6 handicap accessible covered carport spaces, 318 attached fully enclosed standard garages, and 7 handicap accessible fully enclosed garages.. A total of 886 parking spaces would be provided for residential and visitor use, as detailed in Table 2. Seventy-five percent of provided parking, or 677 spaces, would be covered, as detailed in Table 3

Table 2 Residential Unit Parking Requirements

Unit Number and Types	Required Parking Ratio	Required Parking Spaces	Provided Spaces Required
157 1-bedroom	1.5 Spaces per unit	263	236
308 2-bedroom	2.0 spaces per unit	616	616
17 3-bedroom	2.0 spaces per unit	34	34
Total			886

Table 3 Covered Parking Space Compliance

Parking Type	Number of Units
Garage (Covered)	325
Carport (Covered)	352
Stall (Uncovered)	209
Total Spaces	886
Required Covered Spaces (75%)	665
Total Provided Covered Spaces	677

Commercial/Retail Component:

The proposed retail area would include 49,500 square feet of leasable space in 8 single-story buildings on approximately 7.6 acres. This would include six stand-alone buildings and two larger multi-tenant buildings. The building sizes are detailed in Table 4. The proposed fueling station (Building P6) would include a convenience store with quick serve restaurant. The gas station would have six pumping stations (totaling 12 pumps) and a drive-thru car wash. Building P5 is proposed as a drive-thru restaurant.

Table 4 Commercial/Retail Building Size Details

Building Number	Size
Building P1	5,500 sf
Building P2	5,000 sf
Building P3	5,500 sf
Building P4	4,500 sf
Building P5	4,000 sf
Building P6	4,500 sf
Building Shops 1	12,000 sf
Building Shops 2	8,000 sf
Total	49,500 sf

Commercial/Retail Parking Component:

The exact tenant mix is still to be determined. However, the site plan indicates that 15,000 square feet of the proposed retail commercial component would be leased by retail tenants, while 34,000 square feet of the retail commercial square footage would be leased by restaurant tenants. The City of Riverside Parking and Loading Standards require one parking space for every 250 square feet of commercial space, and 1 parking space for every 100 square feet of restaurant space. The retail area would include 406 parking spaces for customers, which include the provision of eight ADA-compliant spaces. Table 5 details the parking requirements.

Table 5 Commercial/Retail Parking Requirements

Use	Required Parking Ratio	Required Number of Parking Spaces	Provided Number of Parking Spaces
Retail	1 space/250 sf	60	60
Restaurant	1 space/100 sf	340	346
Total		400	406

Hotel and Short-Term Visitor Component:

The hotel component would include approximately 130,000 square feet spread over two buildings on approximately 7.4 acres of the project site. The two hotels would contain a total of 229 rooms, and would each be 4 stories in height. The hotels would be fully separate entities; owned/operated by different companies with independent amenities. Hotel 1 would be approximately 70,000 square feet and contain 120 rooms. Hotel 2 would be approximately 60,000 square feet and contain 109 rooms. Each hotel would have a pool for visitor use.

A total of 229 parking spaces would be dedicated to the hotel uses. Hotel 1 would utilize 120 parking spaces and include the provision for eight ADA-compliant spaces, while Hotel 2 would utilize 109 parking spaces including six ADA-compliant spaces. This is in compliance with the City of Riverside Parking and Loading Standards, which requires one parking space per room.

In addition, the project proposes short-term RV Parking situated on the southeast portion of the project site, south of Hotel 2. The RV parking lot would include 23 RV-car spaces and provide 23 standard parking spaces for visitor use, as detailed in Table 6. Each RV parking space would be equipped with water, gas, and electrical hookups. The RV component would include an on-site manager, security monitoring, and the potential for crossover amenities and management by the hotels. Use of the RV Parking area would be for short-term visitors and limited to 30 days in one stall.

Table 6 Hotel Parking Requirements

Use	Required Parking Ratio	Required Number of Parking Spaces	Provided Number of Parking Spaces
Hotel 1	1 space/room	120	120
Hotel 2	1 space/room	109	109
RV Parking	n/a	23	23
RV Vehicle Parking	1 space/RV spot	23	23
Total		252 plus RV spaces	252 plus RV spaces

Farmer's Market, Live Entertainment, and Events:

The proposed development includes provisions for live entertainment and events and a farmers market to serve the proposed residences and surrounding community. The live entertainment would occur within the courtyard in the center of Buildings P1 through P4. The events would occur on occasion, on Fridays, Saturdays, or Sundays, and would comply with the City of Riverside's Noise Ordinance for live entertainment. Events may include car show events, which would be demonstrations only and would not involve the revving of engines, loud stereos, or idling of vehicles. A farmers market is also proposed with the project and would occur on weekends from morning until early afternoon. The farmers market would occur within the parking lot area south of Building Shop 1 and Shop 2.

The farmers market and events occurring in the parking lot would be situated as to not impact the circulation in the parking lots or on the access roads. The events would occur in the parking area shared between all commercial businesses and would be located in an area convenient for local residents, hotel visitors, and commercial customers.

Green Building Features:

A number of green building features and amenities are proposed, including on demand hot water systems, HVAC systems, LED lighting, and individual unit water-use monitoring. Each residential unit would be allocated an electric vehicle (EV) charging station or the wiring for a future charging station. A ride-sharing pick up point is proposed for people living and visiting the site, in order to simplify pick-up and drop-off locations and reduce traffic hazards. A UPS/Fedex concierge service, with package lockers, would also be provided. This would create a one-stop pick-up and drop-off location for packages, reducing the need for idling delivery trucks throughout the residential development.

Open Space, Landscaping, Walls/Fences and Exterior Lighting:

The project is proposing a combination of private and common open space for the residential portion of the project in accordance with the open space requirements of the City of Riverside. The project is proposing 102 square feet of private open space per dwelling unit in the form of patios or balconies, totaling 48,985 square feet. Shared residential open space areas would include low-water landscaping, pools with BBQ areas, seating, and decks, and lawn/turf areas for outdoor activities and gathering spaces. Common open space totals 71,240 square feet, or 148 square feet per dwelling unit. Common open space also includes an approximate 13,000 square foot resident-use only dog park, clubhouses and other structures to provide additional amenities for the residences such as Fedex/UPS concierge service

As detailed in the Conceptual Landscape Plan, landscaping throughout the project site would consist of native, low water use trees, shrubs, and ground cover, as well as various planted accent pots. Common space throughout the commercial portion of the development would include gathering areas with public seating and dining tables, aesthetically pleasing crosswalks, and courtyards with connection walkways.

Lighting for the project would comply with City of Riverside lighting standards and would consist of low-energy LED lights. Approval of a photometric plan detailing project lighting would be obtained prior to issuance of construction permits.

Fencing and walls would include a six-foot high block wall along the northern property line intended to screen the residential uses from the neighboring single-family homes to the north. A decorative five-foot high steel, tubular fence would be placed near the Orange Street entrance and along the south side of buildings P3 and P4. Various decorative block retaining walls up to twelve-feet in height would be constructed around the perimeter of the development to

provide security and privacy. Access to the residences would be gate controlled. All walls and fencing would comply with the City of Riverside standards, with the exception of the proposed twelve-foot high retaining wall, located on the easterly side of the project, adjacent to the interchange.

Utility Infrastructure:

Water

Water services to the development would be provided by Riverside Public Utilities-Water. As mentioned in the Green Building Section, the development would provide water conserving and monitoring infrastructure such as on-demand water heating and individual water-use monitoring systems. The water service would tie into water lines located in Orange Street.

Sewer

There is a number of existing sewer lines that cross the property. The existing lines that run across the property are to be removed. New sewer lines would connect into the existing sewer line along Orange Street. Wastewater services would be provided by Riverside Public Works Department.

Storm Drainage and Water Quality Features

The project site has a cement-lined storm drainage feature which travels through the center of the site running east to west. This cement wash is under the management of the Riverside County Flood Control and Water Conservation District. A large portion of the drainage is proposed to be covered by the primary access road which would enter the project site from Orange Street and portions of the commercial parking area. The project proposes a number of storm drains to convey storm water into the existing stormwater system.

Dry Utilities

Electric services would be provided by Riverside Public Utilities. As mentioned in the Green Building Section, the project is proposing LED lighting to reduce electricity use in the development. Electric Vehicle (EV) changing stations or the wiring for future EV stations is also proposed. There is a potential option for solar to be included in the development. Currently the applicant has not included solar in the proposed project due to the complexity of solar connections into multi-family residential shared systems.

Construction Activity:

Construction is expected to begin in 2019 and take approximately two years to complete. Construction activity would begin with site preparation and grading which would utilize equipment such as tractors, dozers, graders, and scrapers. Building construction and paving activities would utilize cranes, forklifts, welders, rollers, and other paving equipment for construction activities.

10. Surrounding land uses and setting:

The project site is surrounded by existing residential, institutional, and commercial development. The project site is bordered by I-215 to the east and SR-60 to the south.

Table 7 Surrounding Land Use Designations

	Existing Land Use	General Plan Designation	Zoning Designation
Project Site	Vacant Land	MDR - Medium Density Residential, O - Office	R-1-7000 - Single Family Residential, R-3-1500 – Multi-Family Residential, R-1-7000-WC – Single Family Residential and Water Course Overlay
North	Residential	MDR - Medium Density Residential, O – Office, B/OP - Business/Office Park	R-1-7000 - Single Family Residential, R-1-7000-CR - Single Family Residential and Cultural Resources Overlay
West	Residential, Commercial, Fremont Elementary School	MDR - Medium Density Residential, C - Commercial, PF - Public Facilities/ Institutional	R-1-7000 - Single Family Residential, PF - Public Facilities/ Institutional, R-1-7000-WC - Single Family Residential and Water Course Overlay, CG - Commercial General
South	Commercial, Business & Office Park,	C - Commercial, B/OP - Business/Office Park	R-1-7000 - Single Family Residential, BMP - Business Manufacturing Park
East	Residential, I-215	MDR - Medium Density Residential	R-1-7000 - Single Family Residential

11. Other public agencies whose approval is required (e.g., permits, financial approval, or participation agreement.):

- County of Riverside: A County of Riverside Flood Control District concrete drainage channel is located on the project site.
- Caltrans: The project would entail construction activity and roadway improvements within the State right-of-way at the intersection of Orange Street and the SR-60 off-ramp.
- Riverside County Transportation Committee (RCTC)
- Santa Ana Regional Water Quality Control Board – Coverage under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit

12. City Permit Requirements:

The following City approvals and entitlements would be required for the project, depending on the approach the applicant determines to be appropriate:

- General Plan Amendment (GPA), to amend the proposed project area from MDR – Medium Density Residential and O – Office to C – Commercial
- Zoning Code Amendment (RZ), to rezone the proposed project area from R-1-7000 - Single Family Residential, R-3-1500 - Multifamily Residential, and R-1-7000-WC - Single Family Residential – Watercourse Overlay Zones to MU-U - Mixed Use and amend the area proposed for the vehicle fueling station from R-1-7000 – Single Family Residential to CR – Commercial Retail
- Site Plan Review (PPE), the proposed project’s site design and building elevation would be subject to review and approval of a Site Plan Review, with the exception of the vehicle fueling station
- Tentative Parcel Map (PM), to subdivide x parcels into x parcels ranging in size from xxx acres to xxx acres
- Conditional Use Permits (CUP), to permit each of the following uses: Hotels, vehicle fueling stations, drive-thru restaurants, outdoor entertainment, RV parking and Farmers market
- Design Review (DR), for site design and building elevations for the vehicle fueling station
- Grading Exception (GE), for over height retaining walls

- 8 Minor Conditional Use Permit (MCUP), for freestanding freeway-oriented monument signs

Other Environmental Reviews Incorporated by Reference in this Review:

- The Exchange Project – Cultural Resources Study, prepared by Rincon Consultants, Inc., dated July 2018
- The Exchange Project – MSHCP Consistency Analysis and Habitat Assessment, prepared by Rincon Consultants, Inc., dated July 2018
- The Exchange Project - Project Traffic Impact Analysis, prepared by Urban Crossroads, dated January 2018
- Air Quality Impact Analysis, prepared by Urban Crossroads, dated January 2018
- The Exchange Project – Noise Impact Analysis, prepared by Urban Crossroads, dated January 2018
- The Exchange Project – Greenhouse Gas Analysis, prepared by Urban Crossroads, dated January 2018
- General Plan 2025 – City of Riverside, Adopted November 2007
- GP 2025 FPEIR – City of Riverside, Certified November 2007
- Riverside Municipal Code

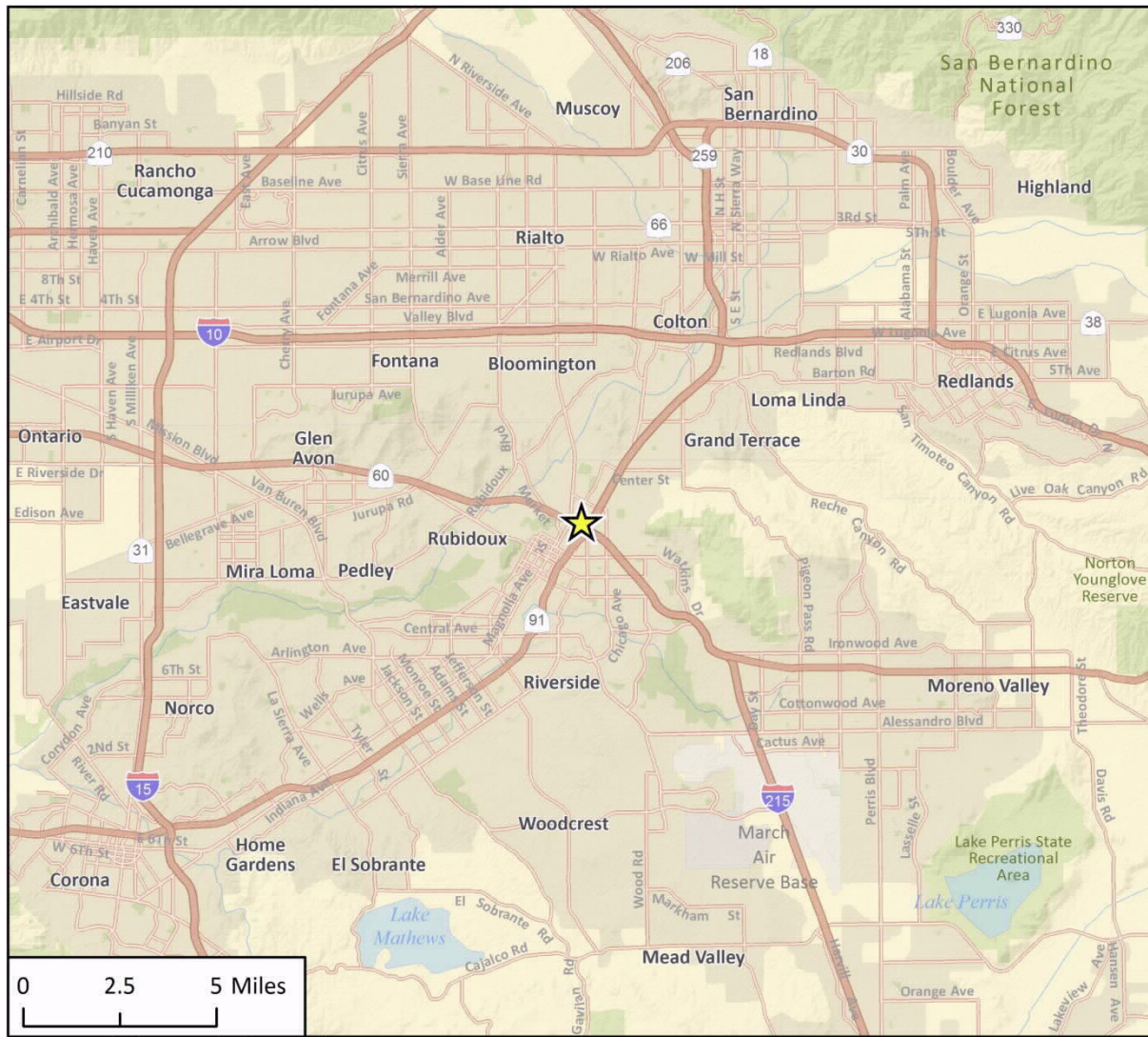
13. Acronyms

AB	Assembly Bill
AQMP	Air Quality Management Plan
ARB	Air Resources Board
AUSD	Alvord Unified School District
BCE	Before Common Era
bgs	below ground surface
BMP	Best Management Practices
C&D	Construction and Demolition
CAAQS	California Ambient Air Quality Standards
CalARP	California Accidental Release Prevention
CalEEMod	California Emissions Estimator Model
CalGreen Code	California Green Building Standards Code
CalEPA	California Environmental Protection Agency
CalFire	California Department of Forestry and Fire Prevention
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CDFW	California Department of Fish and Wildlife
CE	Common Era
CEQA	California Environmental Quality Act
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
cfs	cubic feet per second
CH ₄	Methane
CHMIRS	California Hazardous Material Incident Report System
CMP	Congestion Management Program
CNDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CO	carbon monoxide
CO ₂	carbon dioxide
CO _{2e}	carbon dioxide equivalent
CPTED	Crime Prevention Through Environmental Design
DOF	Department of Finance
DOGGR	Division of Oil, Gas, and Geothermal Resources
DPM	Diesel Particulate Matter
DTSC	Department of Toxic Substances Control
DWQ	Division of Water Quality
DWR	Department of Water Resources
EDR	Environmental Data Resource
EIC	Eastern Information Center
EIR	Environmental Impact Report

EMI	Emissions Inventory Data
EO	Executive Order
EOP	Emergency Operations Plan
EPAP	Economic Prosperity Action Plan
ESA	Environmental Site Assessment
FAR	Floor Area Ratio
FEMA	Federal Emergency Management Agency
FMMP	Farmland Mapping and Monitoring Program
FPEIR	GP 2025 Final Programmatic Environmental Impact Report
FTIP	Federal Transportation Improvement Program
GHG	Greenhouse Gas
GIS	Geographic Information System
GP 2025	General Plan 2025
GPA	General Plan Amendment
gpd	gallons per day
GWP	Global Warming Potential
HCP	Habitat Conservation Plan
HFC	Hydrofluorocarbons
HRA	Health Risk Assessment
I	Interstate
IS	Initial Study
LACM	Los Angeles County Museum of Natural History
LHMP	Local Hazard Mitigation Plan
LLC	Limited Liability Corporation
LOS	Level of Service
LST	localized significance thresholds
LUST	Leaking Underground Storage Tank
MATES-IV	Multiple Air Toxics Exposure Study in the South Coast Air Basin
MBTA	Migratory Bird Treaty Act
MEI	maximally exposed individual
mg/Kg	milligrams per kilogram
MM	mitigation measure
MND	Mitigated Negative Declaration
MPO	Metropolitan Planning Organization
MRF	Materials Recycling Facility
MRZ	Mineral Resource Zone
MSHCP	Multiple Species Habitat Conservation Plan
PW	Public Works, Riverside
RCALUCP	Riverside County Airport Land Use Compatibility Plan
RFD	Riverside Fire Department
RMC	Riverside Municipal Code
RPD	Riverside Police Department
RPU	Riverside Public Utilities
RTP/SCS	Regional Transportation Plan/Sustainable Community Strategy
RUSD	Riverside Unified School District
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SKR-HCP	Stephens' Kangaroo Rat - Habitat Conservation Plan
SR	State Route
SWPPP	Storm Water Pollution Prevention Plan
TAC	Toxic Air Contaminant
TDM	Transportation Demand Management
TMDL	Total Maximum Daily Load
TPH	Total Petroleum Hydrocarbon
TRI	Toxics Release Inventory
UCR	University of California, Riverside
UPRR	Union Pacific Railroad
USACE	U.S. Army Corps of Engineers

USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
USGS	United States Geologic Survey
UST -	Underground Storage Tank
UWMP	Urban Water Management Plan
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compound
WMWD	Western Municipal Water District
WQMP	Water Quality Management Plan

Figure 1 Project Location



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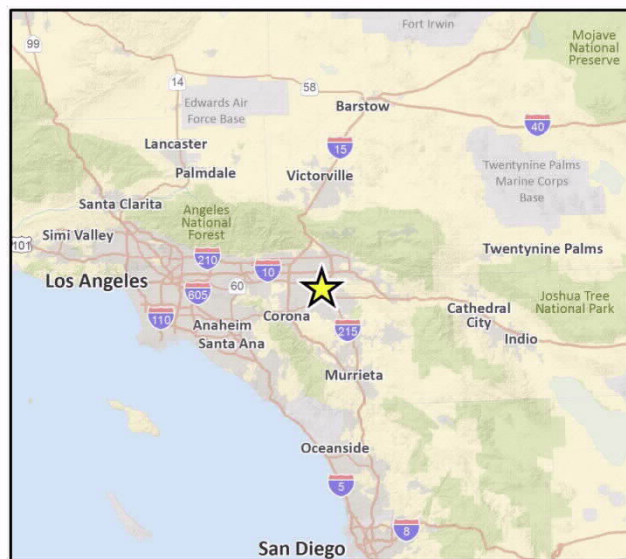


Fig. 1 Regional Location

Figure 2 Project Site



ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- | | | |
|--|---|---|
| <input checked="" type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture & Forest Resources | <input checked="" type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input checked="" type="checkbox"/> Geology/Soils |
| <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards & Hazardous Materials | <input checked="" type="checkbox"/> Hydrology/Water Quality |
| <input checked="" type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Mineral Resources | <input checked="" type="checkbox"/> Noise |
| <input type="checkbox"/> Population/Housing | <input type="checkbox"/> Public Service | <input checked="" type="checkbox"/> Recreation |
| <input checked="" type="checkbox"/> Transportation/Traffic | <input checked="" type="checkbox"/> Tribal Cultural Resources | <input checked="" type="checkbox"/> Utilities/Service Systems |
| <input checked="" type="checkbox"/> Mandatory Findings of Significance | | |

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation which reflects the independent judgment of the City of Riverside, it is recommended that:

The City of Riverside finds that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared. ☐

The City of Riverside finds that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared. ☐

The City of Riverside finds that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required. ☒

The City of Riverside finds that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed. ☐

The City of Riverside finds that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required. ☐

Signature Sally Schiffman

Date 7/24/18

Printed Name & Title Sally Schiffman
Senior Environmental Planner

For City of Riverside



City of Arts & Innovation

COMMUNITY & ECONOMIC DEVELOPMENT DEPARTMENT

Planning Division

Draft Initial Study

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an Environmental Impact Report (EIR) is required.
- 4) “Negative Declaration: Less Than Significant with Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses,” as described in (5) below, may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other California Environmental Quality Act (CEQA) process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a. **Earlier Analysis Used.** Identify and state where they are available for review.
 - b. **Impacts Adequately Addressed.** Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. **Mitigation Measures.** For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measure which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) The explanation of each issue should identify:
 - a. the significance criteria or threshold, if any, used to evaluate each question; and
 - b. the mitigation measure identified, if any, to reduce the impact to less than significance.

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
1. AESTHETICS Would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

1a. Response (*Source: GP 2025 Figure CCM-4 Master Plan of Roadways, GP 2025 Open Space and Conservation Element, GP 2025 FPEIR Figure 5.1-1 Scenic and Special Boulevards and Parkways, Table 5.1-A Scenic and Special Boulevards, and Table 5.1-B Scenic Parkways*)

Less Than Significant Impact. The project site is currently undeveloped and consists of sparse vegetation and multiple trees. The most notable views in the City of Riverside include the La Sierra/Norco Hills (approximately 10 miles northeast of the project site), Sycamore Canyon Wilderness Park (approximately 3.5 miles southeast of the project site), and Box Springs Mountain Reserve Park (approximately 3 miles east of the project site). There are no designated natural and scenic vistas in the project area and the project site is not located in an area with prominent natural features, according to the City of Riverside's General Plan Land Use and Urban Design Element. Furthermore, according to GP 2025 Final Program Environmental Impact Report (FPEIR) Figure 5.1-1 and Tables 5.1-A and 5.1-B, there are no designated scenic or special boulevards along the perimeter or in the vicinity of the project site.

The proposed project would construct buildings at various heights up to four stories. Although the height of the new structures may limit distant views of ridgelines, or peaks, as discussed above, there are no scenic vistas or scenic boulevards on or in close proximity to the site. The project would not detract from views of the identified scenic vistas identified above, as these resources are only partially visible in the distance from the project site. Existing surrounding buildings and natural elevation changes obstruct the majority of these views already. Furthermore, the proposed project would be subject to the City's *Citywide Design and Sign Guidelines* and would be required to undergo Planning Division Staff review and approval to ensure design elements are in accordance with Riverside Municipal Code (RMC) Title 19, prior to project approval. The project would also comply and implement all applicable development standards, General Plan objectives including LU-27, LU-28, LU-29, LU-30, and LU-67, and General Plan policies including LU-30.3, LU-58.7, LU-67.4, and LU-67.5. As there are no identified scenic vistas that would be adversely affected, the project would have a **less than significant impact**, and further analysis of this issue in an EIR is not warranted.

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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1b. Response (*Source: GP 2025 Figure CCM-4 Master Plan of Roadways, GP 2025 FPEIR Figure 5.1-1 Scenic and Special Boulevards, Parkways, Table 5.1-A Scenic and Special Boulevards, Table 5.1-B Scenic Parkways, the City's Urban Forest Tree Policy Manual, Caltrans Scenic Highway Routes*)

Less Than Significant Impact. There are no State scenic highways in the City of Riverside (Caltrans 2017). The proposed development would be located northwest of the SR 60 and SR 91/Interstate 215 interchange. These highways are not listed as Eligible or Officially Designated State or County Scenic Highways according to Caltrans. Strong Street is located north of the project site. Orange Street forms the northwest boundary of the project site. La Cadena Drive terminates at the eastern boundary of the project site. All three streets are 66-foot wide collector streets with two lanes, and are not identified as scenic streets or boulevards according to the GP 2025 FPEIR Tables 5.1-A and 5.1-B, and according to the General Plan Circulation and Community Mobility Element.

The project site is currently vacant and does not contain any significant protected status trees, rock outcroppings, or historic buildings. The project site also contains limited views of the City's hillsides and ridgelines. Although the project may hinder views of the hillsides and ridgelines from the streets and highways adjacent to the project site, these highways and streets are not designated as having scenic importance. Therefore, the project's impact would be **less than significant**, and further analysis of this issue in an EIR is not warranted.

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

1c. Response (Source: GP 2025, GP 2025 FPEIR, Zoning Code, Citywide Design and Sign Guidelines, Northside Community Plan)

Potentially Significant Impact. The project entails the construction of commercial and residential properties, a gas station, and two hotels on a vacant site. Implementation of the project would change the existing visual character and quality of the site. Existing land uses in the vicinity of the project site include residential homes to the north and east (east of I-215), an elementary school to the west, and commercial properties to the south beyond I-60.

The project site is currently vacant and contains sparse vegetation and multiple trees. The proposed project would be subject to the City's Municipal Code, including the Zoning Code, Grading Code, and Subdivision Code development standards, as well as the City's *Citywide Design and Sign Guidelines*. To date, no architectural plan sets depicting building height, massing, scale, conceptual renderings or drawings have been reviewed as part of this Initial Study. Since the project has the potential to degrade the existing quality of the site and visual character of the area, this is a **potentially significant impact**, and this topic will be further analyzed in an EIR.

d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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1d. Response (Source: GP 2025, GP 2025 FPEIR Figure 5.1-2 Mount Palomar Lighting Area, Title 19 Article VIII Chapter 19.556 Lighting, Citywide Design and Sign Guidelines)

Potentially Significant Impact. The project would introduce new lighting and glare to the area. The addition of commercial and residential properties would generate vehicle light and glare, as well new street lights, security lighting, and lighting emitted from buildings. The project would introduce more vehicles to the project area and local neighborhoods which would increase the amount of light and glare from car windows and headlights.

The location of new street lights and general lighting schematics are currently unknown. The performance standards in the City Zoning Code regulating site lighting intend to avoid light and glare impacts. The Zoning Code also contains regulations for lighting within each land use type, including requiring shielding to avoid spillage onto any surrounding properties. Chapter 19.556 Lighting of the RMC regulates light issues in regards to maximum heights of light standards, regulating candle-power of lights, and prohibiting the use of flickering and strobe lights, along with requiring all lighting plans for parking lots be submitted and reviewed by City staff. In addition, the project would be required to adhere to the regulations and policies of the Roadway Lighting Handbook and the Citywide Design and Sign Guidelines for any new illuminated signs that may be proposed. This impact would be **less than significant**, and further analysis of this issue in an EIR is not warranted .

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
2. AGRICULTURE AND FOREST RESOURCES <p>In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and the forest carbon measurement methodology provided in the Forest Protocols adopted by the California Air Resources Board.</p> <p>Would the project:</p>				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2a. Response (Source: GP 2025 Figure OS-2 Agricultural Suitability)

No Impact. The project site is not designated as, and is not adjacent to or in proximity to any land classified as, Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency and Figure OS-2 of the GP 2025. Figure OS-2 shows the project site as Urban and Built Up Land. There are no active agricultural resources or operations, including farmlands on or in proximity of the project site. Therefore, the project would have **no impact** on agricultural uses and further analysis of this issue in an EIR is not warranted.

b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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2b. Response (Source: GP 2025 Figure OS-3 Williamson Act Preserves, GP 2025 FPEIR Figures 5.2-2 Williamson Act Preserves and 5.2-4 Proposed Zones Permitting Agricultural Uses, and RMC Title 19)

No Impact. Pursuant to Figure OS-3 in the GP 2025 and Figures 5.2-2 and 5.2-4 of the GP 2025 FPEIR reveals that the project site is not located within an area that is affected by a Williamson Act Preserve or under a Williamson Act Contract. Moreover, the project site is not zoned for agricultural use. In addition, the site is not located adjacent to or in close proximity to land zoned for agricultural use. Therefore, the project would have **no impact** on agricultural uses, and further analysis of this issue in an EIR is not warranted.

c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)) timberland (as defined in Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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2c. Response (Source: GIS Map Forest Data)

No Impact. The City of Riverside has no designated forest land or timberland as defined in Sections 12220[g] and 4526 of the *California Public Resources Code*. Therefore, the project would have **no impact** on forest land or timberland and further analysis of this issue in an EIR is not warranted.

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2d. Response (Source: GIS Map Forest Data, City of Riverside Zoning Map)

No Impact. The City of Riverside has no designated forest land. Currently, the project site has three zoning designations: Single Family Residential (R-1-7000), Multiple Family Residential (R-3-1500), and Single Family Residential - Water Course Overlay (R-1-7000-WC) per the City's current zoning map. There are no active forest land resources or operations in proximity of the project site. Therefore, the project would have **no impact** on the loss or conversion of forest land, and further analysis of this issue in an EIR is not warranted.

e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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2e. Response (Source: GP 2025 Figure OS-2 Agricultural Suitability, Figure OS-3 Williamson Act Preserves, Title 19 Article V Chapter 19.130 Industrial Zones BMP, and GIS Map Forest Data)

No Impact. The project site is currently zoned with residential designations, with a small portion of the site containing the Water Course Overlay, and does not support agricultural resources or operations. The project would not result in the conversion of designated farmland to non-agricultural uses. In addition, there are no agricultural resources or operations, including farmlands within proximity of the project site. The City of Riverside has no forest land that can support 10 percent native tree cover. Therefore, since the project would not result in the conversion of Farmland to non-agricultural use or result in the loss of forest land, there would be **no impact**, and further analysis of this issue in an EIR is not warranted.

3. AIR QUALITY Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

3a. Response (Source: Air Quality Impact Analysis [Urban Crossroads, 2018a], SCAQMD's 2016 AQMP [2017], SCAG 2016-2040 RTP/SCS [2016])

Potentially Significant Impact. A project may be inconsistent with the Air Quality Management Plan (AQMP) if it would (1) generate population, housing, or employment growth exceeding the forecasts used in the development of the AQMP, or (2) increase the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP. The 2016 AQMP relies on local city general plans' and the Southern California Association of Government's (SCAG) Regional Transportation Plans' (RTP) forecasts of regional population, housing and employment growth in its own projections for managing Basin air quality. The applicable air quality standards used in the AQMP are the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS).

The City General Plan designates the project site under "Office". The project is proposing a "Mixed-Use" designation. As a result, the proposed development would exceed the growth intensities (and therefore emissions) assumed within the General Plan, and thus the growth assumptions used for the AQMP. Therefore, the project would have the potential to result in or cause violations of NAAQS or CAAQS. Since the project has the potential to be inconsistent with the AQMP, this impact is **potentially significant**, and this topic will be further analyzed in an EIR.

b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

3b., c., and d. Response (*Source: Air Quality Impact Analysis [Urban Crossroads, 2018a], Traffic Impact Analysis [Urban Crossroads 2018d], GP 2025 FPEIR Table 5.3-B SCAQMD Air Quality Significance Thresholds, SCAQMD's 2016 AQMP, CalEEMod*)

Potentially Significant Impact. The project area is in the South Coast Air Basin (SCAB), which is bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east, and includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, in addition to the San Geronio Pass area in Riverside County. The South Coast Air Quality Management District (SCAQMD) is the designated air quality control agency for the SCAB. The SCAB is designated a nonattainment area for the federal and state one-hour and eight-hour ozone standards, the state suspended particulate matter (PM₁₀) standard, the federal 24-hour PM_{2.5} standard, and the state and federal annual PM_{2.5} standard (SCAQMD 2016). The SCAB is designated unclassifiable or in attainment for all other federal and state standards. The health effects associated with criteria pollutants upon which attainment of state and federal air quality standards is measured are described in Table 8.

Table 8 Health Effects Associated with Criteria Pollutants

Pollutant	Adverse Effects
Ozone	(1) Short-term exposures: pulmonary function decrements and localized lung edema in humans and animals, risk to public health implied by alterations in pulmonary morphology and host defense in animals; (2) long-term exposures: risk to public health implied by altered connective tissue metabolism and altered pulmonary morphology in animals after long-term exposures and pulmonary function decrements in chronically exposed humans; (3) vegetation damage; and (4) property damage.
Carbon monoxide (CO)	Reduces oxygen delivery leading to: (1) Aggravation of chest pain (angina pectoris) and other aspects of coronary heart disease; (2) decreased exercise tolerance in persons with peripheral vascular disease and lung disease; (3) impairment of central nervous system functions; and (4) possible increased risk to fetuses.
Nitrogen dioxide (NO ₂)	(1) Potential to aggravate chronic respiratory disease and respiratory symptoms in sensitive groups; (2) risk to public health implied by pulmonary and extra-pulmonary biochemical and cellular changes and pulmonary structural changes; and (3) contribution to atmospheric discoloration.
Sulfur dioxide (SO ₂)	(1) Bronchoconstriction accompanied by symptoms that may include wheezing, shortness of breath, and chest tightness during exercise or physical activity in persons with asthma.
Suspended particulate matter (PM ₁₀)	(1) Excess deaths from short-term and long-term exposures; (2) excess seasonal declines in pulmonary function, especially in children; (3) asthma exacerbation and possibly induction; (4) adverse birth outcomes including low birth weight; (5) increased infant mortality; (6) increased respiratory symptoms in children such as cough and bronchitis; and (7) increased hospitalization for both cardiovascular and respiratory disease (including asthma). ^a
Suspended particulate matter (PM _{2.5})	(1) Excess deaths from short- and long-term exposures; (2) excess seasonal declines in pulmonary function, especially in children; (3) asthma exacerbation and possibly induction; (4) adverse birth outcomes, including low birth weight; (5) increased infant mortality; (6) increased respiratory symptoms in children, such as cough and bronchitis; and (7) increased hospitalization for both cardiovascular and respiratory disease, including asthma. ^a

^a More detailed discussions on the health effects associated with exposure to suspended particulate matter can be found in the following documents: Office of Environmental Health Hazard Assessment, Particulate Matter Health Effects and Standard Recommendations, www.oehha.ca.gov/air/toxic_contaminants/PM10notice.html#may, May 9, 2002; and EPA, Air Quality Criteria for Particulate Matter, October 2004. Source: US EPA 2016

The SCAQMD adopted the 2016 Air Quality Management Plan (AQMP) on March 3, 2017, which provides a strategy for the attainment of state and federal air quality standards. The SCAQMD recommends the use of quantitative thresholds to

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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determine the significance of temporary construction-related pollutant emissions and project operations. These thresholds are shown in Table 9.

Table 9 SCAQMD Air Quality Significance Thresholds

Criteria Pollutant	Construction Thresholds (pounds/per day)	Operational Thresholds (pounds/per day)
ROG	75	55
NO _x	100	55
CO	550	550
PM ₁₀	150	150
PM _{2.5}	55	55
SO _x	150	150

Source: SCAQMD. March 2015. Accessed February 2018 at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>

In addition to the above thresholds, the SCAQMD has developed Localized Significance Thresholds (LSTs), which were devised in response to concern regarding exposure of individuals to criteria pollutants in local communities. LSTs represent the maximum emissions from a project that would not cause or contribute to an air quality exceedance of the most stringent applicable federal or state ambient air quality standard at the nearest sensitive receptor, taking into consideration ambient concentrations in each source receptor area (SRA), distance to the sensitive receptor, and project size; LSTs have been developed for emissions within construction areas up to five acres in size and for receptors within a minimum 82 feet from emission source. However, LSTs only apply to emissions within a fixed stationary location and are not applicable to mobile sources, such as cars on a roadway (SCAQMD 2008). As such, LSTs are typically applied only to construction emissions as the majority of operational emissions are associated with project-generated vehicle trips.

The project site is located in Source Receptor Area 23 (SRA 23), Metropolitan Riverside County (SCAQMD 2008). The SCAQMD provides lookup tables for project sites that measure one, two, three, four, or five acres. The project site is approximately 35.4 gross acres and grading is anticipated to occur across the entirety of the site. However, this analysis assumes that there would be no more than five acres under active construction at one time, and relies on the five-acre LSTs for significance determinations. The five-acre LSTs provide a more stringent threshold for construction emissions compared to the analysis of emissions over a larger area. The closest sensitive receptors are single-family residential homes on Sonic Court, a church on Strong Street, 10 feet, and 82 feet from the northern site boundary, respectively, and single family residential homes and Fremont Elementary School along Orange Street, approximately 100 and 300 feet from the western site boundary, respectively. The shortest distance for which LSTs are provided is 82 feet, which would capture impacts to closer receptors as well, and so this is the distance that was used for project analysis as shown in Table 10.

Table 10 SCAQMD LSTs for Construction (SRA-23)

Pollutant	Allowable Site Preparation Emissions¹	Allowable Grading Emissions
Gradual conversion of NO _x to NO ₂	220	237
CO	1,230	1,346
PM ₁₀	10	11
PM _{2.5}	6	7

¹ Allowable construction emissions based on a 5-acre site in SRA-23 for receptor 82 feet away (lbs/day)

Source: Urban Crossroads 2018a.

The proposed project would involve the construction of multi-family residential, commercial, and hotel development. Construction and operational emissions were estimated using the California Emissions Estimator Model (CalEEMod), version 2016.3.1, per GP 2025 FPEIR MM Air 1 and 7. CalEEMod uses project-specific information, including the project's land uses, square footages for different uses (e.g., residential, parking), and location, as well as model defaults that can be

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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tailored for a specific project to estimate a project's construction and operational emissions. Construction emissions modeled include emissions generated by construction equipment used on-site, such as backhoes and bulldozers, as well as emissions generated by vehicle trips associated with construction, such as hauling trips and employee travel. Operational emissions modeled include mobile source emissions (i.e., vehicle emissions), energy emissions, and area source emissions. Mobile source emissions include emissions generated by delivery truck trips and employee trips to and from the project site associated with operation of the proposed project. Emissions attributed to energy use include natural gas consumption for space and water heating, in addition to the emissions associated with electricity. Area source emissions are generated by landscape maintenance equipment, consumer products, and architectural coating.

The proposed project was modeled assuming construction of 479,773 square feet of low rise apartments, 130,000 square feet of hotel spread over two buildings, 14,000 square feet of shopping center, 26,000 square feet of sit-down restaurant space, 4,000 square feet of fast food restaurant space, and 4,500 square feet of convenience market with gas station. In addition to project details, a construction schedule was provided by the applicant and used for construction phase lengths. The CalEEMod defaults were used for the number and type of equipment used during each phase of construction. Trip generation rates for the proposed uses were adjusted to match rates used in the Traffic Impact Analysis completed for the project (Urban Crossroads 2018d). In addition, it was assumed the project would comply with all applicable regulatory standards, such as SCAQMD Rule 1113, which limits reactive organic gas (ROG) content in flat and non-flat coatings to 50 grams per liter and Rule 403, which requires watering of disturbed ground surfaces to maintain soils in a damp condition during earth-moving activities; it was assumed watering would occur three times a day.

Construction Emissions

Construction activities associated with the proposed project would consist of grading, site preparation, construction of the proposed buildings, parking lot and roadway paving, and architectural coating. These construction activities would generate temporary emissions of fugitive dust (measured as particulate matter), exhaust emissions from heavy construction vehicles and soil hauling trucks, and ROG from architectural coatings.

Table 11 summarizes the estimated maximum daily emissions of pollutants during construction on the project site.

Table 11 Short-Term Construction Emissions

Activity	Maximum Daily Emissions (pounds/day)					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
SCAQMD Daily Thresholds Construction	75	100	550	150	150	55
Maximum Daily Emissions ¹	127.9	71.8	61.1	0.2	23.5	13.1
Exceeds Threshold? (Y/N)	Y	N	N	N	N	N
LSTs (On-site Site Preparation Emissions, 82 feet away)	N/A	220	1,230	N/A	10	6
Maximum Daily Emissions	N/A	71.6	23.7	N/A	23.3	13.0
Exceeds Threshold? (Y/N)	N/A	N	N	N/A	Y	Y
LSTs (On-site Grading Emissions, 82 feet away)	N/A	237	1,346	N/A	11	7
Maximum Daily Emissions	N/A	71.2	35.7	N/A	12.6	6.3
Exceeds Threshold? (Y/N)	N/A	N	N	N/A	Y	N

¹Includes emissions from grading, paving, building construction, and architectural coating; totals include worker trips, soil export hauling trips, construction vehicle emissions, and fugitive dust.

Source: Urban Crossroads 2018a.

As shown in Table 11, construction emissions would exceed the SCAQMD regional standards for ROG, as well as the LSTs for particulate matter (PM₁₀ and PM_{2.5}). Although adherence to GP 2025 FPEIR MM Air 4 (reduced construction diesel emissions) and SCAQMD Rule 403 (reduced particulate matter) would reduce the short-term construction emissions to the extent feasible; impacts to regional air quality and local receptors would remain **potentially significant**. There is potential for the project square footage numbers used in the analysis to change slightly as the project moves through the review process. However, these changes would not change the potential for impacts and this topic will be further analyzed in an EIR.

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Operational Emissions

On-site

Table 12 summarizes estimated emissions associated with operation of the proposed project. The majority of project-related operational emissions would be due to area emissions and vehicle trips to and from the site.

Table 12 Long-Term Operational Emissions

Activity	Daily Emissions (pounds/day)					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Total Maximum Daily Emissions (Summer Scenario)	178.7	221.0	567.4	1.6	99.7	55.0
Total Maximum Daily Emissions (Winter Scenario)	173.6	219.6	541.6	1.6	99.7	55.0
SCAQMD Daily Thresholds Operational	55	55	550	150	150	55
Exceeds Threshold? (Y/N)	Y	Y	Y	N	N	N

Source: Urban Crossroads 2018a.

As shown in Table 12, project-generated emissions would exceed SCAQMD regional thresholds for ROG, NO_x, and CO. There is potential for project numbers to change from numbers used in the analysis. However, long-term operational impacts to regional air quality and local receptors would remain **potentially significant**, and this topic will be further analyzed in an EIR.

CO Hotspots

Although operational emissions would not exceed SCAQMD thresholds, heavily congested intersections can lead to long-term mobile emissions that exceed carbon monoxide (CO) standards and lead to CO hotspots. CO hotspots are locations where the federal or State ambient air quality standards could be exceeded because of the concentration of motor vehicles that are idling. Other factors contributing to a CO hotspot include the configuration of the intersection, distance to sensitive receptors, and patterns of air circulation. While the SCAQMD has not established a formal screening threshold for carbon monoxide (CO) hotspot analysis, the Bay Area Air Quality Management District (BAAQMD) has established the following threshold: under existing and future emission rates, a project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour in order to generate a significant CO impact (BAAQMD 2017). According to the Traffic Impact Analysis completed for the project (Urban Crossroads, 2018d) no intersections affected by the project would be required to accommodate more than 44,000 vehicles per hour even during peak hours under future cumulative conditions. Therefore, no intersection-specific CO modeling is required. No substantial pollutant concentrations would be expected as a result of the project.

Since long-term emissions associated with the proposed project would not exceed SCAQMD thresholds, impacts would be **less than significant**, and further analysis of long-term operational emissions in an EIR is not warranted.

Sensitive Receptors

Certain population groups, such as children, the elderly, and people with health problems, are particularly sensitive to air pollution. Sensitive receptors are defined as land uses that are more likely to be used by these population groups and include health care facilities, retirement homes, school and playground facilities, and residential areas. Sensitive receptors near the project site include existing residential homes and Fremont Elementary School. The closest sensitive receptor location is an outdoor living area approximately 10 feet north of the project site on Sonic Court. As discussed above, the project would potentially exceed SCAQMD thresholds for construction and operational emissions. Therefore, impacts to sensitive receptors from pollutant concentrations would be **potentially significant**, and this issue will be further analyzed in an EIR.

e. Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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3e. Response (Source: SCAQMD CEQA Air Quality Handbook, Air Quality Impact Analysis [Urban Crossroads 2018a])

Less Than Significant Impact. The 1993 SCAQMD CEQA Air Quality Handbook identifies land uses associated with odor

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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complaints to be agriculture uses, wastewater treatment plants, chemical and food processing plants, composting, refineries, landfills, dairies, and fiberglass molding. The proposed project contains residential and commercial land uses, including restaurants. These uses are not identified in the Handbook's list as odor contributing sources. Potential odor sources associated with the proposed project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities and the temporary storage of typical solid waste (refuse) associated with the proposed project's (long-term operational) uses. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature, and would cease upon completion of the respective phase of construction. It is expected that project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the County's solid waste regulations. In addition, the project would have to comply with SCAQMD Rule 402, which prohibits the discharge of air contaminants that would cause injury, detriment, nuisance, or annoyance to the public. Therefore, the proposed project would not generate objectionable odors affecting a substantial number of people. This impact would be **less than significant**, and further analysis of this issue in an EIR is not warranted.

4. BIOLOGICAL RESOURCES Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

4a. Response (Source: MSHCP Consistency Analysis and Habitat Assessment [Rincon Consultants 2017b]).

Potentially Significant Impact. The project site is located in the Multiple Species Habitat Conservation Plan (MSHCP) survey area for burrowing owl (*Athene cunicularia*: BUOW); therefore, a habitat assessment was conducted on September 28, 2017 by a qualified biologist (Rincon Consultants 2017a). The survey area consisted of the area within the proposed limits of work (35.4-acre project site) and an additional 500-foot buffer. The most current BUOW survey instructions for the MSHCP dated March 29, 2006, state that negative results for surveys conducted outside of the breeding season (March 1-August 31) are not conclusive proof that BUOW do not use the project site and may not provide an accurate picture of the number of BUOW that utilize the site. Therefore, due to the potential presence of the BUOW on-site, this issue requires further analysis to determine the extent to which the project would affect BUOW and/or other sensitive species. Impacts are **potentially significant**, and will be further analyzed in an EIR.

b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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4b. Response (Source: MSHCP Consistency Analysis and Habitat Assessment [Rincon Consultants 2017b]).

Potentially Significant Impact. The project site supports two drainage features (referred to as Drainage 1 and Drainage 2). Drainage 1 is a cement-lined storm flow drainage that runs east to west, and traverses through the center of the site. It contains no hydrophytic vegetation and is lined with disturbed non-native grass habitat. Since the conveyance of water within this feature remains within a closed system, no riparian/riverine conditions exist for Drainage 1. Per the MSHCP Assessment, Drainage 2 appears to be an erosional feature and is characterized by weedy species such as arundo and jimson weed (*Datura stramonium*). However, small patches of isolated riparian species such as California sycamore occur along its limits within the project site. Therefore, this drainage would most likely be considered riparian/riverine under the MSHCP. Drainage 2, which contains patches of riparian habitat, would be impacted as part of the proposed project. Therefore, impacts to riparian habitat or other sensitive natural communities are **potentially significant**, and will be further analyzed in an EIR.

c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
other means?				

4c. Response (Source: USFWS National Wetlands Inventory [USFWS 2017] and Habitat Assessment [Rincon Consultants 2017b]).

Potentially Significant Impact. As mentioned above under Response 4b, the project site contains two drainages, Drainage 1 and Drainage 2. Drainage 1 does not meet the criteria for a riparian/riverine area per MSHCP guidelines and would not be affected by project activities. Drainage 2 consists of a small drainage feature that occurs directly south of Strong Street, east of Sonic Court, and west of La Cadena Drive. This drainage contains water, and flows into Drainage 1 within the project site. Drainage 2 was likely created by urban run-off from the housing developments located to the north of the project site, and appears to be an erosional feature and is characterized by weedy species such as arundo and jimson weed (*Datura stramonium*). Because this feature is not within an active streambed, appears to be an erosional feature from residential development that did not previously exist, and does not appear to flow into a natural water body, it would likely not fall under the jurisdiction of U.S. Army Corps of Engineers, but could fall under the jurisdiction of the Regional Water Quality Control Board or the California Department of Fish and Wildlife. In addition, since the proposed project may adversely affect Drainage 2, development of the project site may impact a potential Water of the State. Impacts to wetlands are **potentially significant**, and this impact will be further analyzed in an EIR.

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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4d. Response (Source: MSHCP, GP 2025 Figure OS-7 MSHCP Cores and Linkage, Box Springs Mountain Reserve Comprehensive Trails Master Plan, and MSHCP Consistency Analysis and Habitat Assessment [Rincon Consultants 2017b]).

Less Than Significant Impact. The project would be subject to the MSHCP and would be consistent with the GP 2025. The proposed project would not conflict with GP 2025 Policy OS-6.4, which requires the City to continue efforts to establish a wildlife movement corridor between Sycamore Canyon Wilderness Park and the Box Springs Mountain Regional Park, and between Box Springs Mountain Reserve and the Santa Ana River via Springbrook Wash as identified in the MSHCP and the City's GP 2025. The project would also be consistent with GP 2025 Policy OS-6.1 which addresses preserving wildlife migration areas in general.

Therefore, through implementation of the GP 2025 policies discussed here, as well as the MSHCP and the Box Springs Mountain Reserve Comprehensive Trails Master Plan (Riverside, County of 2015), and policies which preserve open space in general, the project would not substantially interfere with the movement of any native resident or migratory fish or wildlife species or the establishment of native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. This impact would be **less than significant**, and further analysis of this issue in an EIR is not warranted.

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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4e. Response (Source: MSHCP, Title 16 Section 16.72.040 Establishing the Western Riverside County MSHCP Mitigation Fee, Title 16 Section 16.40.040 Establishing a Threatened and Endangered Species Fees, City of Riverside Urban Forestry Policy Manual, and MSHCP Consistency Analysis and Habitat Assessment [Rincon Consultants 2017b]).

Potentially Significant Impact. Implementation of the proposed project would be subject to all applicable Federal, State, and local policies and regulations related to the protection of biological resources, including tree preservation. The project would be required to comply with RMC Section 16.72.040 establishing the MSHCP mitigation fee and Section 16.40.040 establishing the Threatened and Endangered Species Fees.

Section 6.1.4 of the MSHCP contains Urban/Wildlands Interface Guidelines. According to Section 6.1.4 of the MSHCP, the Urban/Wildlands Interface Guidelines are intended to address indirect effects associated with locating development in proximity to the MSHCP Conservation Area. The project site is not adjacent to a conservation area and the Urban/Wildlife

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Interface Guidelines are not applicable.

The GP 2025 Open Space/Conservation Element includes policies to ensure development does not conflict with any local policies or ordinances protecting biological resources. The Habitat Assessment completed for the project (Rincon Consultants 2017b) concluded that there may be water features or riparian habitats on the project site as defined under Section 6.1.2 of the MSHCP (discussed under Response 4b and 4c). Since the project has the potential to conflict with local policies or ordinances protecting biological resources this impact is **potentially significant**, and will be further analyzed in an EIR.

f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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4f. Response (Source: MSHCP, GP 2025 Figure OS-6 SKR-HCP)

Potentially Significant Impact. Due to proposed development on a site which contains potential water features, protected species, and riparian habitat, the project may conflict with the guidelines of the MSHCP and related policies in the GP 2025. Therefore, as the project has the potential to be inconsistent with the MSHCP and/or conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan, this impact is **potentially significant**, and will be further analyzed in an EIR.

5. CULTURAL RESOURCES				
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5 of the CEQA Guidelines?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

5a. Response (Source: GP 2025 FPEIR Table 5.5-A Historical Districts and Neighborhood Conservation Areas and Appendix D, Title 20 of the RMC, Cultural Resources Survey [Rincon Consultants 2017a])

No Impact. A Cultural Resources Study was completed by Rincon Consultants in October 2017. The report identified 81 previously recorded cultural resources within a one- mile radius of the project site. One of these resources, CA-RIV-004299, is located on the project site. Resource CA-RIV-004299 was recorded in 1991 by Patricia Jertberg. The site consists of structural remains associated with a 1920's residence and associated outbuildings that once occupied the property. Features include a series of joined concrete walls, concrete posts, railing, and retaining walls. No historic artifacts were observed when the site was recorded. The previous address for the residence was 3485 Vista Street. The resource has been recommended as ineligible for listing on the CRHR and NRHP, due to a lack of integrity and historical association. Based on the findings of the current survey, Rincon concurred with this recommendation. The site's integrity has diminished further since its original recording and no longer possesses integrity of design, setting, workmanship, feeling, or associate. It cannot be demonstrated that it is associated with events or persons significant in our past (Criteria 1 and 2; Padon 1991). The concrete foundations and structural remnants do not embody the distinctive characteristics of a type, period, or method of installation (Criterion 3). Historic refuse was identified in association with the site; however, no diagnostic artifacts were identified nor was there any indication that the artifact types present may yield information important to history (Criterion 4). The refuse deposit represents only a small amount of rural household refuse, which is ubiquitous throughout the general area in association with rural residences. Therefore, the project would have **no impact** on historical resources as defined in Section 15064.5 of the CEQA Guidelines, and further analysis of this issue in an EIR is not warranted.

b. Cause a substantial adverse change in the significance of an archeological resource pursuant to § 15064.5 of the CEQA Guidelines?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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5b. Response (Source: GP 2025 FPEIR Figure 5.5-1 Archaeological Sensitivity and Figure 5.5-2 Prehistoric Cultural Resources Sensitivity and Appendix D, Cultural Resources Survey [Rincon Consultants 2017a])

Potentially Significant Impact. According to the Cultural Resources Study (Rincon 2017), there are no known

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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archeological resources present on the project site. However, it is possible that additional subsurface deposits are present that could be encountered during project-related ground-disturbing activities. Furthermore, the project site is considered moderately sensitive for buried prehistoric resources due to its proximity to the Santa Ana River. This impact is **potentially significant**, and will be further analyzed in an EIR.

c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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5c. Response (Source: GP 2025 Policy HP-1.3, Cultural Resources Survey [Rincon Consultants 2017a])

Potentially Significant Impact. The Cultural Resources Study (Rincon 2017a) did not discuss paleontological resources. Excavation and ground disturbing activities during construction have the potential to directly or indirectly disturb intact paleontological resources. Furthermore, the project site is considered moderately sensitive for buried prehistoric resources due to its proximity to the Santa Ana River. However, standards conditions of approval addressing the potential discovery of paleontological resources will be applied to this project. Therefore, this impact is **less than significant**, and further analysis of this issue in an EIR is not warranted.

d. Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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5d. Response (Source: GP 2025 FPEIR Figure 5.5-1 Archaeological Sensitivity and Figure 5.5-2 Prehistoric Cultural Resources Sensitivity, Cultural Resources Survey [Rincon Consultants 2017a])

Less Than Significant Impact. Due to ground disturbing activities during construction, the potential exists for the discovery of human remains. If human remains are found, the State of California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the county coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. In the event of an unanticipated discovery of human remains, the county coroner must be notified immediately. If the human remains are determined to be prehistoric, the coroner would notify the Native American Heritage Commission (NAHC), which would determine and notify a most likely descendant (MLD). The MLD shall complete the inspection of the site within 48 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials. With adherence to existing regulations regarding the treatment of human remains, there would be a **less than significant impact**, and further analysis of this issue in an EIR is not warranted.

6. GEOLOGY AND SOILS				
Would the project:				
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

6a.i. Response (Source: GP 2025 Figure PS-1 Regional Fault Zones & GP 2025 FPEIR Appendix E Geotechnical Report)

No Impact. The entire southern California region, including the project area, is considered to be seismically active. However, there are no Alquist-Priolo Fault Zones in Riverside, and the project site does not contain any known fault lines. The nearest active Alquist-Priolo Fault Zones are the San Jacinto Fault and the Elsinore Fault, located approximately seven miles east and 20 miles southwest of the project site, respectively. Therefore, the potential for fault rupture at or near the project site is low. The project has **no impact** related to rupture of a known earthquake fault, and further analysis of this issue in an EIR is not warranted.

ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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6a.ii. Response (Source: GP 2025 FPEIR Appendix E Geotechnical Report)

Less than Significant Impact. The entire southern California region, including the project area, is considered seismically active. Therefore, the project could be subject to ground shaking generated from activity on regional faults. The San Jacinto Fault Zone and the Elsinore Fault Zone are located seven miles east and 20 miles southwest of the project site, respectively. Both faults have the potential to cause moderate to large earthquakes that would result in intense ground shaking. The proposed project would construct multiple structures, some of which would not be for permanent, full-time occupancy (i.e. gas station and commercial space). The project does propose habitable buildings, in the form of multi-family residences and hotels. All buildings would be required to comply with applicable CBC Title 24 regulations, which establish engineering standards appropriate for the potential seismic hazards of the project site. Compliance with Title 24 regulations would result in a structure designed to resist structural collapse and thereby provide reasonable protection from serious injury, catastrophic property damage, and loss of life as a result of strong seismic ground shaking. Therefore, the project would have **less than significant impact** related to seismic ground shaking, and further analysis of this issue in an EIR is not warranted.

iii. Seismic-related ground failure, including liquefaction?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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6a.iii. Response (Source: GP 2025 Figure PS-1 Regional Fault Zones, Figure PS-2 Liquefaction Zones, GP 2025 Figure PS-3 Soils with High Shrink-Swell Potential, and GP 2025 FPEIR Appendix E Geotechnical Report)

Potentially Significant Impact. The project site is located in identified low, moderate, and high potential zones for liquefaction as depicted in the GP 2025 Liquefaction Zones Map Figure PS-2. As stated in the Geotechnical Report for GP 2025 for liquefaction hazards in the City, due to the lack of available City-specific geologic and engineering properties data, areas of liquefaction potential shown in the GP figure should be considered approximate. Since the site shows three separate risks of liquefaction, including high potential, the project could be susceptible to liquefaction hazards. This impact is **potentially significant**, and will be further analyzed in an EIR.

iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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6a.iv. Response (Source: GP 2025 FPEIR Figure 5.6-1 Areas Underlain by Steep Slope, GP 2025 FPEIR Appendix E Geotechnical Report, Riverside Municipal Code Title 18 Subdivision Code, and Title 17 Grading Code)

Less Than Significant Impact. The project site has generally flat topography in an area not prone to landslides per Figure 5.6-1 of the GP 2025 Program Final PEIR. The slope of the site rests between 0 and 10 percent, with identified central and southern areas of the site increasing from 10 to 15 percent. There are no mountains, rolling hill topography, or features that pose landslide risks to the site. In addition, all buildings would be required to meet CBC standards. Therefore, there would be a **less than significant impact** related to landslides, and further analysis of this issue in an EIR is not warranted.

b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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6b. Response (Source: GP 2025 FPEIR Figure 5.6-1 Areas Underlain by Steep Slope, Figure 5.6-4 Soils, Table 5.6-B Soil Types, Riverside Municipal Code Title 18 Subdivision Code, Title 17 Grading Code)

Less Than Significant Impact. Soil erosion is the process by which soil particles are removed from a land surface by wind, water, or gravity. Most natural erosion occurs at slow rates; however, the rate of erosion increases when land is cleared or altered and left in a disturbed condition. The project site contains soil types (Buren, Hanford, Pachappa, and San Emiglio) which have slight to moderate erosivity, according to Figure 5.6-4 and Table 5.6-B in the GP 2025 FPEIR. Construction activities may result in temporary erosion of topsoil during grading activities. However, upon project completion, the site would not contain any loose or exposed topsoil, and conditions that would cause long-term erosion would not be present. Combined with the relatively flat topography present at the project site, grading and development activities would not result in substantial soil erosion or loss of topsoil. Therefore, the project would have a **less than significant impact** on soil erosion or loss of topsoil, and further analysis of this issue in an EIR is not warranted.

c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?				

6c. Response (Source: GP 2025 Figure PS-1 Regional Fault Zones, Figure PS-2 Liquefaction Zones, Figure PS-3 Soils with High Shrink-Swell Potential, GP 2025 FPEIR Figure 5.6-1 Areas Underlain by Steep Slope, Figure 5.6-4 Soils, Table 5.6-B Soil Types, and GP 2025 FPEIR Appendix E Geotechnical Report)

Potentially Significant Impact. The project site is generally flat, and on-site soils have low to moderate swelling potential per GP 2025 FPEIR Figure PS-3. As described previously in this section, the project site is not considered susceptible to landslides and the site is not located on an existing fault. As discussed in 6a.iii however, the project site is located in an area identified with liquefaction hazards. Due to potential liquefaction risks that could result in ground failure, implementation of the project could be located on unstable soil or become unstable as a result of the project. This impact is **potentially significant** and will be further analyzed in an EIR.

d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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6d. Response (Source: GP 2025 FPEIR Figure 5.6-4 Soils, Table 5.6-B Soil Types, Figure 5.6-5 Soils with High Shrink-Swell Potential, GP 2025 FPEIR Appendix E Geotechnical Report, and California Building Code as adopted by the City of Riverside and set out in Title 16 of the RMC)

No Impact. Pursuant to Figure 5.6-4 and Table 5.6-B of the GP 2025 FPEIR, the project site does not contain expansive soils. Therefore, the project would have **no impact** resulting in substantial risks to life or property due to expansive soils.

e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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6e. Response (Source: GP 2025 FPEIR Figure 5.6-4 Soils, Table 5.6-B Soil Types)

No Impact. The proposed project would be served by the municipal sewer system and would not entail the construction or use of septic tanks or alternative waste water disposal systems. Therefore, there would be **no impact** related to soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems.

7. GREENHOUSE GAS EMISSIONS				
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

7a. Response (Source: Riverside Restorative Growthprint [City of Riverside 2016], and Greenhouse Gas Analysis [Urban Crossroads 2018b])

Potentially Significant Impact. Climate change is the observed increase in the average temperature of the Earth's atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period of time. Climate change is the result of numerous, cumulative sources of greenhouse gases (GHGs). GHGs contribute to the "greenhouse effect," which is a natural occurrence that helps regulate the temperature of the planet. The majority of radiation from the Sun hits the Earth's surface and warms it. The surface in turn radiates heat back towards the atmosphere, known as infrared radiation. Gases and clouds in the atmosphere trap and prevent some of this heat from escaping back into space and re-radiate it in all directions. This process is essential to supporting life on Earth because it warms the planet by approximately 60° Fahrenheit. Emissions from human activities since the beginning of the industrial revolution (approximately 250 years ago) are adding to the natural greenhouse effect by increasing the gases in the atmosphere that trap heat, thereby contributing to an average increase in the Earth's temperature.

GHGs occur naturally and from human activities. Human activities that produce GHGs are the burning of fossil fuels (coal,

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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oil and natural gas for heating and electricity, gasoline and diesel for transportation); methane from landfill wastes and raising livestock; deforestation activities; and some agricultural practices. GHGs produced by human activities include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). Emissions of GHGs affect the atmosphere directly by changing its chemical composition while changes to the land surface indirectly affect the atmosphere by changing the way in which the Earth absorbs gases from the atmosphere. Potential impacts of global climate change in California may include loss of snow pack, sea level rise, more extreme heat days per year, more high ozone days, more large forest fires, and more drought years (CEC March 2009).

Senate Bill (SB) 97, signed in August 2007, acknowledges that climate change is an environmental issue that requires analysis in California Environmental Quality Act (CEQA) documents. In March 2010, the California Resources Agency (Resources Agency) adopted amendments to the State CEQA Guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions. The adopted guidelines give lead agencies the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHGs and climate change impacts.

Senate Bill 32 became effective on January 1, 2017 and requires the ARB to develop technologically feasible and cost effective regulations to achieve the targeted 40 percent GHG emission reduction. ARB is currently working to update the Scoping Plan to provide a framework for achieving the 2030 target. The updated Scoping Plan is expected to be completed and adopted by ARB in 2017 (ARB 2017). The Proposed Scoping Plan calls for emissions reductions at the State level that meet or exceed the statewide GHG target, and notes that additional effort would be needed to maintain and continue GHG reductions to meet the mid- (2030) and long-term (2050) targets. However, there is currently no detailed pathway to achieve the reductions. Additionally, the proposed Scoping Plan recognizes the need to reach beyond statewide policy and engage local jurisdictions to develop plans to address local conditions and provide a “fair share” contribution towards the achievement of the State’s GHG reduction targets. To assist local planning efforts with developing strategies to meet these targets, ARB has developed the annual community-wide thresholds of no more than six metric tons CO₂e per capita by 2030 and no more than two metric tons CO₂e per capita by 2050.

Although not formally adopted, the SCAQMD has a recommended quantitative threshold of 3,000 MT of CO₂e per year for mixed-use projects (SCAQMD 2010). This screening threshold was developed to capture 90 percent of mixed-use projects in the SCAQMD and was based on the goals of Assembly Bill 32 (AB 32).

The Riverside City Council approved the Sustainable Riverside Policy Statement (SRPS) in 2005 and is committed to becoming a greener, more sustainable community. The SRPS emphasizes the implementation of cleaner, greener, and more sustainable programs. Riverside’s 38 point Green Action Plan focuses on energy, greenhouse gas emissions, waste reduction, urban design, urban nature, transportation, and water.

The City of Riverside’s 2025 General Plan includes policies that ensures that GHG emissions will be reduced in future City of Riverside development and operations. The relevant policies are listed below:

- Policy AQ-8.2: Support appropriate initiatives, legislation, and actions for reducing and responding to climate change.
- Policy AQ-8.3: Encourage community involvement and public-private partnerships to reduce and respond to global warming.
- Policy AQ-2.4: Monitor and strive to achieve performance goals and/or VMT reduction, which are consistent with SCAG’s goals.

Additionally, the Western Riverside Council of Governments (WRCOG) completed a subregional climate action plan (CAP) that encompasses twelve cities in the subregion, including Riverside, that have joined efforts to develop the CAP. The CAP sets forth a subregional emissions reduction target, emissions reduction measures, and action steps to reduce GHG emissions and demonstrate consistency with California’s Global Warming Solutions Act of 2006 (Assembly Bill [AB] 32). The CAP contains GHG reduction measures organized into four primary sectors, as follows: energy, transportation and land use, solid waste, and water. If fully implemented, the CAP would exceed WRCOG’s 2020 goal by 2.1 percent, achieving an overall 17.1 percent reduction in GHG emissions by 2020.

Then, in January 2016, Riverside adopted the Riverside Restorative Growthprint (RRG), which combines two plans: the Economic Prosperity Action Plan (RRG-EPAP) and the Climate Action Plan (RRG-CAP). The RRG-CAP expands upon the subregional CAP and provides a path for the City to achieve reductions in GHG emissions through 2035, while the RRG-EPAP provides a framework for smart growth and low-carbon economic development. The City’s baseline GHG emissions

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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inventory (2007) is a benchmark for tracking the City's progress in achieving future reductions. The community-wide inventory identifies the quantity of GHG emissions produced by residents, businesses, and municipal government operations. The inventory reflects the emissions generated within the City that result from the operation of motor vehicles, use of electricity and natural gas, and disposal of solid waste.

Emissions associated with the proposed project were estimated using CalEEMod, version 2016.3.1. GHG emissions associated with construction emissions and operational emissions from the proposed project are discussed below.

Construction Emissions

Construction of the proposed project would generate temporary GHG emissions primarily due to the operation of construction equipment and truck trips. Site preparation and grading typically generate the greatest amount of emissions due to the use of grading equipment and soil hauling. Construction activity was assumed to occur over a period of approximately 21 months, based on information provided by the project applicant. As shown in Table 13, construction activity for the project would generate an estimated 2,584 MT of CO₂e. When amortized over a 30-year period, construction of the project would generate about 86.14 MT of CO₂e per year.

Table 13 Estimated GHG Emissions: Construction

Emission Source	Emissions (Metric Tons CO₂e/Year)
Construction 2018	1,292
Construction 2019	1,292
Total	2,584
Amortized over 30 years	86.14

Source: Urban Crossroads 2018a,b

Operational Emissions

Table 14 combines the operational and mobile GHG emissions associated with development of the project. The annual emissions would total approximately 22,182 MT of CO₂e. These emissions exceed the SCAQMD threshold of 3,000 MT per year for compliance with SB 32. Since GHG emissions would exceed the SCAQMD's threshold, the project would generate a substantial increase in GHG emissions and would conflict with AB 32 or SB 32.

Table 14 Estimated GHG Emissions: Operational

Operational Emissions Source	GHG Emissions (MTCO₂e)/year)*
Annual Construction Emissions (Amortized Over 30 Years)	86
Operational (Mobile) Sources	13,213
Area Sources	163
Energy	7,805
Solid Waste	339
Water	576
Total	22,182
SCAQMD Threshold	3,000
Threshold Exceeded?	Yes

*MT=Metric Tons
Source: Urban Crossroads 2018b.

As mentioned above, project emissions would exceed SCAQMD's GHG emissions threshold of 3,000 MT CO₂e/year. The project would result in total annual GHG emissions of 22,182 MT CO₂e (30-year amortized construction emissions of 86 MT CO₂e, combined with annual operational emissions of 22,096 MT CO₂e), which exceeds the SCAQMD threshold. Therefore, since the project would exceed SCAQMD thresholds for GHG emissions, this impact is **potentially significant impact**, and will be further analyzed in an EIR.

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

7b. Response (Source: Greenhouse Gas Analysis [Urban Crossroads 2018b]))

Potentially Significant Impact. The project would comply with the Riverside Restorative Growthprint (RRG) provisions designed to reduce GHGs. The RRG combines two plans: the Economic Prosperity Action Plan (RRG-EPAP) and the Climate Action Plan (RRG-CAP). The RRG-CAP serves as a Qualified GHG Reduction Strategy consistent with State CEQA Guidelines and outlines a programmatic approach to review the potential GHG-related impacts associated with new development. Table 15 shows the project's consistency with the following RRG-CAP Emission Reduction Strategies and underlying state regulations:

Table 15 Riverside Restorative Growthprint – Climate Action Plan Emission Reduction Strategies Consistency

Measure/Regulation	Project Consistency
State and Regional Regulations	
Energy	
California Building Energy Efficiency Standards (Title 24, Part 6). Maximize energy efficiency building and appliance standards, and pursue additional efficiency efforts including new technologies, and new policy and implementation mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California (including both investor-owned and publicly owned utilities).	Potentially Consistent. The proposed project would be required to comply with the 2016 California Building Energy Efficiency Standards (Title 24, Part 6) including measures to incorporate energy-efficient building design features.
Water	
Water Use Efficiency. Reduce per capita water use by 20% by 2020. SB X7-7 is part of a California legislative package passed in 2009 that requires urban retail water suppliers to reduce per-capita water use by 10% from a baseline level by 2015, and to reduce per capita water use by 20% by 2020. Green accountability performance (GAP) Goal 16 directly aligns with SB X7-7. In Southern California, energy costs and GHG emissions associated with the transport, treatment, and delivery of water from outlying regions are high. Therefore, the region has extra incentive to reduce water consumption. While this is considered a state measure, it is up to the local water retailers, jurisdictions, and water users to meet these targets.	Potentially Consistent. The proposed project would be required to comply with Title 19 – Article VIII – Chapter 19.570 – Water Efficient Landscaping and Irrigation, including measures to increase water use efficiency. Water efficient irrigation systems and devices and drought tolerant landscaping would be installed on the project site.
Solid Waste	
Construction and Demolition Waste Diversion. Meet mandatory requirement to divert 50% of C&D waste from landfills by 2020 and exceed requirement by diverting 90% of C&D waste from landfills by 2035.	Potentially Consistent. In compliance with CalGreen requirements, at least 65% of all nonhazardous construction waste generated by the proposed project would be required to be recycled and/or salvaged (including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard). Furthermore, 100% of excavated soil shall be reused or recycled.
Transportation	
Pavley and Low Carbon Fuel Standard (LCFS). ARB identified this measure as a Discrete Early Action Measure. This measure would reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020.	Potentially Consistent. The project would not involve the manufacture, sale, or purchase of vehicles. However, vehicles that operate within and access the project site would be expected to comply with Pavley and Low Carbon Fuel Standard. Medium duty and heavy duty trucks and trailers accessing the site during construction and during operational delivery activities would be subject to

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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aerodynamic and hybridization requirements as established by ARB; no feature of the project would interfere with implementation of these requirements and programs.

RRG-CAP Measures

Energy Measures

E-1: Traffic and Street Lights

Replace traffic and street lights with high-efficiency bulbs.

Not Applicable.

This objective is aimed at government agencies, not private developers. Nonetheless, the project would be expected to comply with applicable energy efficiency requirements related to lighting detailed in the Green Building Standards Code (Title 24, California Code of Regulations).

E-2: Shade Trees

Strategically plant trees at new residential developments to reduce the urban heat island effect.

Potentially Consistent.

The project would be required to comply with the City of Riverside Landscape Design Guidelines and Chapter 19.57 of the Riverside Municipal Code. The project site is currently vacant and contains sparse vegetation and multiple trees. To date, no landscape plans, or plan sets depicting plantings, conceptual renderings or drawings have been reviewed as part of this Initial Study.

E-3: Local Utility Programs – Electricity

Financing and incentives for business and home owners to make energy efficient, renewable energy, and water conservation improvements

Not Applicable.

This objective is aimed at government agencies, not private developers. Nonetheless, the project would be expected to comply with applicable energy efficiency requirements detailed in the Green Building Standards Code (Title 24, California Code of Regulations).

E-4: Renewable Energy Production on Public Property

Large scale renewable energy installation on publicly owned property and in public rights of way.

Not Applicable.

This objective is aimed at government agencies, not private developers.

E-5: UCR Carbon Neutrality

Collaborate with UCR to achieve a carbon neutral campus.

Not Applicable.

This objective is aimed at government agencies and the University of California, Riverside, not private developers.

E-6: RPU Technology Grants

RPU grant programs to foster research, development and demonstration of innovative solutions to energy problems.

Not Applicable.

This objective is aimed at government agencies, not private developers.

Transportation Measures

T-1: Bicycle Infrastructure Improvements

Expand on-street and off-street bicycle infrastructure, including bicycle lanes and bicycle trails.

Potentially Inconsistent.

The City of Riverside's master plan of trails and bikeways show no existing/planned Class II bike lanes along Strong Street, Orange Street, or W La Cadena Drive.

T-2: Bicycle Parking

Provide additional options for bicycle parking.

Potentially Consistent.

The project would be expected to comply with Riverside Municipal Code Chapter 10.64 regarding bicycle accommodations.

T-3: End of Trip Facilities

Encourage use of non-motorized transportation modes by providing appropriate facilities and amenities for commuters

T-4: Promotional Transportation Demand Management

Encourage Transportation Demand Management strategies.

Potentially Inconsistent.

Pursuant to Chapter 19.88 of the Riverside Municipal Code, businesses generating one hundred or more employees are required to prepare and submit a trip reduction plan to reduce work-related vehicle trips by 6.5 percent from the number of trips related to the project as indicated in the most current edition of the Trip Generation Handbook, published by the Institute of Traffic Engineers (ITE). Methods to achieve the vehicle reduction targets may include, but are not limited to:

- Alternative work schedules/ flex-time

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
		<ul style="list-style-type: none"> ▪ Carpool parking ▪ Bicycle parking and shower facilities ▪ Information center for transportation alternatives ▪ Rideshare vehicle loading areas ▪ Vanpool vehicle accessibility ▪ Bus stop improvements ▪ On-site child care facilities ▪ Onsite amenities such as cafeterias ▪ Transit incentives for employees, such as subsidy of bus passes ▪ Use of low and/or ultra-low fleet vehicles <p>The number of anticipated employees is not currently known at this time.</p>		
T-5: Traffic Signal Coordination Incorporate technology to synchronize and coordinate traffic signals along local arterials.		Not Applicable. This objective is aimed at government agencies, not private developers.		
T-6: Density Improve jobs-housing balance and reduce vehicle miles traveled by increasing household and employment densities.		Potentially Consistent. The project would introduce a mixed-use center that places employment opportunities next to existing and new residences. By providing local jobs, the project would improve the jobs-housing balance and is anticipated to help reduce vehicle miles traveled by local residents.		
T-7: Mixed-Use Development Provide for a variety of development types and uses.		Potentially Consistent. The project would introduce a mix of residential, commercial, and hotel development consistent with this measure.		
T-8: Pedestrian-Only Areas Encourage walking by providing pedestrian-only community areas.		Potentially Consistent. The project would introduce a mix of residential, commercial, and hotel development within walking distance. The proposed internal pedestrian circulation is unknown at this time, but is anticipated to allow for pedestrian-only connection areas including courtyards and walkways. .		
T-9: Limit Parking Requirements for New Development Reduce requirements for vehicle parking in new development projects.		Not Applicable. This objective is aimed at government agencies, not private developers. The project would be expected to comply with applicable City parking requirements.		
T-10: High Frequency Transit Service Implement bus rapid transit service in the subregion to provide alternative transportation options.		Not Applicable. This objective is aimed at government agencies, not private developers. However, the project vicinity is served by the Riverside Transit Authority (RTA) Route 12 and Omnitrans route along the I-215.		
T-11: Voluntary Transportation Demand Management Encourage employers to create TDM programs for their employees		Potentially Inconsistent. Pursuant to Chapter 19.88 of the Riverside Municipal Code, businesses generating one hundred or more employees are required to prepare and submit a trip reduction plan to reduce work-related vehicle trips by 6.5 percent from the number of trips related to the project as indicated in the most current edition of the Trip Generation Handbook, published by the Institute of Traffic Engineers (ITE). Methods to achieve the vehicle reduction targets may include, but are not limited to: <ul style="list-style-type: none"> ▪ Alternative work schedules/ flex-time ▪ Carpool parking ▪ Bicycle parking and shower facilities ▪ Information center for transportation alternatives ▪ Rideshare vehicle loading areas ▪ Vanpool vehicle accessibility ▪ Bus stop improvements ▪ On-site child care facilities ▪ Onsite amenities such as cafeterias ▪ Transit incentives for employees, such as subsidy of bus passes 		

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
	<ul style="list-style-type: none"> Use of low and/or ultra-low fleet vehicles <p>The number of anticipated employees is not currently known at this time.</p>			
T-12: Accelerated Bike Plan Implementation Accelerate the implementation of all or specified components of a jurisdiction's adopted bike plan.	Not Applicable. This objective is aimed at government agencies, not private developers. However, the proposed project would not obstruct the implementation of an adopted bike plan.			
T-13: Fixed Guideway Transit By 2020, complete feasibility study and by 2025 introduce a fixed route transit service in the jurisdiction.	Not Applicable. This objective is aimed at government agencies, not private developers.			
T-14: Neighborhood Electric Vehicle Programs Implement development requirements to accommodate Neighborhood Electric Vehicles and supporting infrastructure.	Not Applicable. This objective is aimed at government agencies, not private developers.			
T-15: Subsidized Transit Increase access to transit by providing free or reduced passes	Potentially Inconsistent. Pursuant to Chapter 19.88 of the Riverside Municipal Code, businesses generating one hundred or more employees are required to prepare and submit a trip reduction plan to reduce work-related vehicle trips by 6.5 percent from the number of trips related to the project as indicated in the most current edition of the Trip Generation Handbook, published by the Institute of Traffic Engineers (ITE). Methods to achieve the vehicle reduction targets may include, but are not limited to: <ul style="list-style-type: none"> Alternative work schedules/ flex-time Carpool parking Bicycle parking and shower facilities Information center for transportation alternatives Rideshare vehicle loading areas Vanpool vehicle accessibility Bus stop improvements On-site child care facilities Onsite amenities such as cafeterias Transit incentives for employees, such as subsidy of bus passes Use of low and/or ultra-low fleet vehicles <p>The number of anticipated employees is not currently known at this time.</p>			
T-16: Bike Share Program Create nodes offering bike sharing at key locations throughout the City.	Not Applicable. This objective is aimed at government agencies, not private developers.			
T-17: Car Share Program Offer Riverside residents the opportunity to use car sharing to satisfy short-term mobility needs.	Potentially Inconsistent. Pursuant to Chapter 19.88 of the Riverside Municipal Code, businesses generating one hundred or more employees are required to prepare and submit a trip reduction plan to reduce work-related vehicle trips by 6.5 percent from the number of trips related to the project as indicated in the most current edition of the Trip Generation Handbook, published by the Institute of Traffic Engineers (ITE). Methods to achieve the vehicle reduction targets may include, but are not limited to: <ul style="list-style-type: none"> Alternative work schedules/ flex-time Carpool parking Bicycle parking and shower facilities Information center for transportation alternatives Rideshare vehicle loading areas Vanpool vehicle accessibility Bus stop improvements On-site child care facilities 			

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
		<ul style="list-style-type: none"> Onsite amenities such as cafeterias Transit incentives for employees, such as subsidy of bus passes Use of low and/or ultra-low fleet vehicles 		
T-18: SB 743- Alternative to LOS Use SB 743 to incentivize development in the downtown and other areas served by transit.		Not Applicable. This objective is aimed at government agencies, not private developers. Furthermore, the project is not located in a transit priority area.		
T-19: Alternative Fuel & Vehicle Technology and Infrastructure Promote the use of alternative fueled vehicles such as those powered by electric, natural gas, biodiesel, and fuel cells by Riverside residents and workers.		Potentially Inconsistent. Pursuant to Chapter 19.88 of the Riverside Municipal Code, businesses generating one hundred or more employees are required to prepare and submit a trip reduction plan to reduce work-related vehicle trips by 6.5 percent from the number of trips related to the project as indicated in the most current edition of the Trip Generation Handbook, published by the Institute of Traffic Engineers (ITE). Methods to achieve the vehicle reduction targets may include, but are not limited to: <ul style="list-style-type: none"> Alternative work schedules/ flex-time Carpool parking Bicycle parking and shower facilities Information center for transportation alternatives Rideshare vehicle loading areas Vanpool vehicle accessibility Bus stop improvements On-site child care facilities Onsite amenities such as cafeterias Transit incentives for employees, such as subsidy of bus passes Use of low and/or ultra-low fleet vehicles The number of anticipated employees is not currently known at this time.		
T-20: Eco- Corridor/Green Enterprise Zone Create a geographically defined area(s) featuring best practices in sustainable urban design and green building focused on supporting both clean-tech and green businesses.		Not Applicable. This objective is aimed at government agencies, not private developers.		
Water Measure				
W-1: Water Conservation and Efficiency Reduce per capita water use by 20% by 2020.		Potentially Consistent. The proposed project would be required to be consistent with applicable water efficiency requirements detailed in the Green Building Standards Code (Title 24, California Code of Regulations). As such, the project would be equipped with low-flow plumbing fixtures, reducing water use.		
Solid Waste Measures				
SW-1: Yard Waste Collection Provide green waste collection bins community-wide.		Potentially Consistent. This objective is aimed at government agencies, not private developers. Nonetheless, the project would comply with applicable solid waste requirements.		
SW-2: Food Scrap and Compostable Paper Diversion Divert food and paper waste from landfills by implementing commercial and residential collection program.		Potentially Consistent. The project would be required to participate in applicable waste diversion programs. The project would also be subject to all applicable State and City requirements for solid waste reduction.		
Food, Agriculture, and Urban Forest Measures				
A-1: Local Food and Agriculture Promote local food and agricultural programs.		Not Applicable. This objective is aimed at government agencies, not private developers.		
A-2: Urban Forest Augment City's Urban and Community Forest Program		Potentially Inconsistent. The project would be required to comply with the City of Riverside		

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
to include an Urban Forest Management Plan		Landscape Design Guidelines and Chapter 19.57 of the Riverside Municipal Code. The project site is currently vacant and contains sparse vegetation and multiple trees. To date, no landscape plans, or plan sets depicting plantings, conceptual renderings or drawings have been reviewed as part of this Initial Study.		

In addition to the features noted in Table 15 above, the project would be constructed in accordance with the California Green Building Standards, which require energy efficiency, water efficiency, and material conservation and resource efficiency measures. As discussed in Table 15, the project has the potential to conflict with state regulations intended to reduce GHG emissions statewide, and would be potentially inconsistent with certain policies designed to reduce GHG emissions. Therefore, this impact is **potentially significant**, and this issue will be further analyzed in an EIR.

8. HAZARDS & HAZARDOUS MATERIALS				
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

8a. Response (Source: GP 2025 Public Safety Element, GP 2025 FPEIR, California Health and Safety Code, Title 49 of the Code of Federal Regulations,)

Less Than Significant Impact. Potential hazardous materials, such as fuel, paint products, lubricants, solvents, and cleaning products, may be used and/or stored on site during the construction of the proposed project. However, due to the limited quantities of these materials to be used by the project, they are not considered hazardous to the public at large. Hazardous materials, such as fuel, would be used and stored on site during the operation of a vehicle service station (gas station) as a stand-alone commercial building within the proposed project. In accordance with the City's Hazardous Materials Policy, the transport, use, and storage of hazardous materials during the construction and operation of the site would be conducted pursuant to all applicable local, State and federal laws, including but not limited to Title 49 of the Code of Federal Regulations implemented by Title 13 of the CCR, which describes strict regulations for the safe transportation of hazardous materials, and in cooperation with the County's Department of Environmental Health. As required by California Health and Safety Code Section 25507, a business shall establish and implement a Hazardous Materials Business Emergency Plan for emergency response to a release or threatened release of a hazardous material in accordance with the standards prescribed in the regulations adopted pursuant to Section 25503 if the business handles a hazardous material or a mixture containing a hazardous material that has a quantity, at any one time, above the thresholds described in Section 25507(a)(1) through (6). Furthermore, the proposed land use, as residential, commercial/retail, and hotel development, would not entail the manufacturing or disposal of hazardous materials. Compliance with all applicable local, State, and federal laws would ensure a **less than significant impact** from the routine transport, use, or disposal of hazardous materials, and further analysis of this issue in an EIR is not warranted.

b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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8b. Response (Source: GP 2025 Public Safety Element, California Health and Safety Code, Title 49 of the Code of Federal Regulations,)

Less Than Significant Impact. The proposed project would not entail the manufacturing or disposal of hazardous materials. As stated in response 8a, potential hazardous materials such as fuel, paint products, lubricants, solvents, and cleaning products may be used and/or stored on site during the construction and/or operation of the building. However, due to the limited quantities of these materials to be used by the project, they are not considered hazardous to the public at large. Hazardous materials, such as fuel, would be used and stored on site during the operation of a gas station as a commercial building within the proposed project. In accordance with the City's Hazardous Materials Policy, the transport, use, and storage of hazardous materials during the construction and operation of the site would be conducted pursuant to all applicable local, State and federal laws, including but not limited to Title 49 of the Code of Federal Regulations implemented

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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by Title 13 of the CCR, which describes strict regulations for the safe transportation of hazardous materials, and in cooperation with the County's Department of Environmental Health. Required compliance with all applicable local, State, and federal laws would ensure a for the project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. This impact is **less than significant**, and further analysis in an EIR is not warranted.

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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8c. Response (Source: GP 2025 Public Safety and Education Elements, GP 2025 FPEIR Table 5.7-D CalARP RMP Facilities in the Project Area, Figure 5.13-2 RUSD Boundaries, Table 5.13-D RUSD Schools,)

Less Than Significant Impact. The nearest school is Fremont Elementary School (1925 Orange Street) located directly across Orange Street, approximately 300 feet west of the project site. It is not anticipated that the residential and hotel uses of the proposed project would include the emission or handling of hazardous materials, substances, or waste. However, the proposed gas station would include the emission and handling of hazardous materials and/or substances. As stated in response to 8a and 8b, in accordance with the City's Hazardous Materials Policy, the transport, use, and storage of hazardous materials during the operation of the site would be conducted pursuant to all applicable local, State and federal laws, including but not limited to Title 49 of the Code of Federal Regulations implemented by Title 13 of the CCR, which describes strict regulations for the safe storage of hazardous materials, and in cooperation with the County's Department of Environmental Health. Therefore, the project would not emit hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school directly, indirectly or cumulatively. This impact is **less than significant**, and further analysis in an EIR is not warranted.

d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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8d. Response (Source: GP 2025 Figure PS-5 Hazardous Waste Sites, GP 2025 FPEIR Figure 5.7-1 Hazardous Waste Sites, GP 2025 FPEIR Tables 5.7-A CERCLIS Facility Information, Figure 5.7-B Regulated Facilities in TRI Information and 5.7-C DTSC EnviroStor Database Listed Sites, DTSC Envirostor Database, SWRCB Geotracker Database))

Less Than Significant Impact. A review of the Cortese List database and federal superfund site database found that the project site is not listed as a hazardous materials site. The nearest hazardous materials site is located at 2190 Main Street, approximately 500 feet southwest of the project site, and is not included on the national priorities list because contaminants of concern in soil and groundwater (petroleum hydrocarbons, e.g. gasoline) were removed from the site (SWRCB 2017). Two other hazardous materials sites are listed within a 1,000-foot radius of the project site. The hazardous materials site located at 2221 Main Street, approximately 700 feet to the west-southwest of the project site, is not included on the national priorities list because contaminants of concern in soil (petroleum hydrocarbons) were removed from the site (SWRCB 2017). The hazardous materials site located at 1689 West La Cadena Drive, approximately 600 feet to the northeast of the project site, is not included on the national priorities list because contaminants of concern in soil (petroleum hydrocarbons, e.g. gasoline) were determined to be present at low concentrations (SWRCB 2017). There are no other hazardous materials sites listed within a 1,000-foot radius of the project site. Therefore, since the project would not be located on a hazardous site, and would not create a significant hazard to the public or environment, there is **no impact**, and further analysis in an EIR is not warranted.

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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8e. Response (Source: Riverside County Airport Land Use Compatibility Plan [RCALUCP])

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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No Impact. The project site is not located within any airport land use plan area or within two miles of a public airport. The nearest airport is the Flabob Airport, located 2.5 miles west of the project site. The project site is outside of the airport's influence area. Therefore, the project would not result area aviation-related safety hazards for people residing or working in the project area. There would be **no impact**, and further analysis of this issue in an EIR is not warranted.

f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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8f. Response (Source: GP 2025 Figure PS-6 Airport Safety Zones and Influence Areas, RCALUCP)

No Impact. The project site is not located in the vicinity of a private airstrip. Therefore, the project would have **no impact** related to the safety of people near private airstrips, further analysis of this issue in an EIR is not warranted.

g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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8g. Response (Source: GP 2025 FPEIR Chapter 5.7 Hazards and Hazardous Materials, City of Riverside's Emergency Operations Plan, Riverside Multi-Jurisdictional LHMP)

No Impact. Project implementation would not alter or otherwise interfere with public rights-of-way and would provide internal ingress and egress to emergency response vehicles. The project would be required to comply with applicable California Fire Code (Title 24, California Code of Regulations, Section 9) requirements. Therefore, the project would not impair or physically interfere with an existing City-wide emergency response or evacuation plans. There would be **no impact**, and further analysis of this issue in an EIR is not warranted.

h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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8h. Response (Source: GP 2025 Figure PS-7 Fire Hazard Areas, CalFIRE VHFHSZ in LRA for Western Riverside 2010, City of Riverside's Emergency Operations Plan, Riverside Multi-Jurisdictional LHMP, GP 2025 PFEIR Figure 5.7-3 Fire Hazard Areas)

No Impact. The project site is located in an urban, developed area of the City of Riverside, and is not located in the moderate, high, or very high fire hazard rating areas as depicted in the 2025 General Plan. With required adherence to GP 2025 policies, compliance with existing codes and standards, and adherence to Riverside Fire Department (RFD) practices, the project would not expose people or structures to hazards related to wildland fires. There would be **no impact**, and further analysis in an EIR is not warranted.

9. HYDROLOGY AND WATER QUALITY				
Would the project:				
a. Violate any water quality standards or waste discharge requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Substantially alter the existing drainage pattern of the site or area, including the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or offsite?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Would the project create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Would the project otherwise substantially degrade water quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

9a, c, d, e, f. Response (*Source: GP 2025 FPEIR Hydrology and Water Quality*)

Potentially Significant Impact. The project site is within the jurisdiction of the Santa Ana region of the California Regional Water Quality Control Board (RWQCB), which is responsible for the preparation and implementation of the water quality control plan for the Santa Ana River Watershed. Regulations under the federal Clean Water Act require compliance with the National Pollutant Discharge Elimination System (NPDES) storm water permit for projects disturbing more than one acre during construction. All components of the project would be required to comply with the NPDES Multiple Separate Storm Sewer System (MS4) Permit issued by the Santa Ana RWQCB, which would require implementation of Best Management Practices (BMPs). BMPs would be required to reduce polluted runoff from the project sites by retaining, treating, or infiltrating polluted runoff onsite. The project developer would also be required to prepare a Standard Urban Storm Water Management Plan (SUSMP), which requires the integration of post-construction BMPs into the sites overall drainage system. This would further reduce the potential for pollutants to enter the storm drain system.

The project site is located in an urbanized area, and is almost entirely covered with pervious surfaces, and would be altered with the introduction of new impervious surfaces (roadways, parking lots, structures, etc.). The project would redevelop the sites with buildings of larger mass and scale and would increase the amount of impervious surfaces on the site. The development of the site would involve re-grading of the sites existing conditions and the final site improvement would change the surface runoff pattern. Water drainage could potentially impact erosion or siltation on or off-site and introduce new pollutants. Therefore, impacts related to site drainage and runoff would be **potentially significant** and will be further analyzed in an EIR.

b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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9b. Response (*Source: GP 2025 FPEIR Hydrology and Water Quality*)

Potentially Significant Impact. The City of Riverside currently receives the majority of its water from groundwater supplies in the region. Due to the projects size and scale, the project's projected water demand is currently unknown. In addition to the use of potential groundwater for the projects construction and operational phases, there is potential that during excavation and ground disturbing activities, groundwater may be encountered beneath the site. Impacts are **potentially significant**, and will be further analyzed in an EIR.

g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

9g,h,i. Response (*Source: GP 2025 FPEIR Hydrology and Water Quality, FEMA Flood Map Service Center, GP 2025 FPEIR Figure 5.8-2*)

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Potentially Significant Impact. The project site is located in FEMA Flood Insurance Rate Map #06065C0726G, which is effective as of August 28th, 2008. Although the site is generally located in Zone X (areas of minimal flood hazards), a portion of the western end of the site along Orange Street is located in Zone AE (regulatory floodway), which is a Special Flood Hazard Area. As construction of the project would occur in this area, the project would place housing and structures in an area subject to identified flood hazard risks. Although development on the site would not be located in a dam inundation area, as identified in the GP 2025 FPEIR, flooding impacts are **potentially significant** and will be further analyzed in an EIR.

j. Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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9j. Response (Source: Google Earth, GP 2025 FPEIR Hydrology and Water Quality)

No Impact. The project site is located over 40 miles from the Pacific Ocean coastline. There are no substantial bodies of water that pose seiche or tsunami risks to the project site. Mudflows are commonly associated with landslide risks, and as discussed in Section 6, *Geology and Soils*, the project site is relatively flat with no identified landslide risks which could trigger mudflows. There would be **no impact**, and further analysis in an EIR is not warranted.

10. LAND USE AND PLANNING				
Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

10a. Response (Source: GP 2025 Land Use and Urban Design Element, Project Site Plan)

No Impact. The project site is currently vacant, undeveloped, and located at the northwest corner where SR 60 Intersects with SR 91. The project site is bounded by Orange Street and West La Cadena Drive to the east and west sides, respectively, and SR 60 to the south. Single family homes are adjacent to the north, except for a small portion of the site which extends between two homes to Strong Street. There are no residences, sidewalks, or accessible areas that currently exist on the project site. The project would not displace any residences or result in the removal or division of established community infrastructure (ex. sidewalks, roads, bike lanes). Therefore, there would be **no impact**, and further analysis in an EIR is not warranted.

b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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10b. Response (Source: GP 2025 Figure LU-7 Redevelopment Areas Map, Figure LU-10 Land Use Policy Map, Table LU-5 Zoning/General Plan Consistency Matrix, RMC)

Less than Significant Impact. The City of Riverside General Plan has land use objectives and policies that pertain to planning areas throughout the city. The project site is located within the Northside Neighborhood community, which the City General Plan has specific objectives and policies that apply to the area. The City is currently in the process of developing a Northside Specific Plan, which intends to update the outdated 1991 Northside Community Plan that was incorporated into the 2025 General Plan policies. The timeframe for the adoption of the updated Northside Specific Plan is uncertain, so the project was compared with policies in currently adopted land use plans.

The project site is currently designated for residential and office land uses. Part of the project proposal is to change the Zoning and General Plan land use designations for the project site to Mixed Use and Commercial Retail. The project would comply with the development standards of the Zoning Ordinance and would promote many of the objectives and policies within the 2025 General Plan, specifically those related to the Northside Neighborhood.

Land Use Element:

Policy LU-8.1: Ensure well-planning infill development. Citywide, allow for increased density in selected areas along established transportation corridors.

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Policy LU-8.3: Allow for mixed-use development at varying intensities at selected areas as a means of revitalizing underutilized urban parcels.

Policy LU-9.4: Encourage the design of new commercial developments as “integrated centers,” rather than as small individual strip development. Integrate pedestrian access, parking, access, building design and landscape themes across all parcels in the commercial center to unity the development.

Policy LU-72.5: Encourage appropriate retail opportunities to better serve the Northside Neighborhood.

Policy LU-74.5: Land use interfaces between residential and commercial or industrial properties should receive special design consideration to protect the scenic integrity of the residential neighborhood.

Housing Element:

Policy H-2.2: Encourage the production and concentration of quality mixed-use and high density housing along major corridors and infill sites throughout the City in accordance with smart growth principles articulated in the General Plan.

Policy H-2.4: Provide development standards and incentives to facilitate live-work housing, mixed-use projects, accessory dwellings, student housing, and other housing types.

Based on the proposed project and land use objectives in the associated with the Northside Neighborhood, the project would comply with and promote many of the land use policies within the currently adopted policy plans. It is anticipated that project would comply with the Northside Specific Plan as the objectives and policies are developed during the plan preparation process. As the project complies with all available policies but cannot be fully compared to the draft Northside Specific Plan, the project would have a **less than significant impact**, and further analysis is not warranted.

c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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10c. Response (Source: MSHCP, GP 2025 Figure OS-6 SKR-HCP)

Potentially Significant Impact. As discussed in Section 4, *Biological Resources*, due to proposed development on a site which contains potential water features, protected species, and riparian habitat, the project may conflict with the guidelines of the MSHCP and related policies in the GP 2025. Therefore, as the project has the potential to be inconsistent with the MSHCP and/or conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan, this impact is **potentially significant**, and will be further analyzed in an EIR.

11. MINERAL RESOURCES				
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

11a. Response (Source: General Plan 2025 Figure OS-1 Mineral Resources, General Plan 2025 Open Space and Conservation Element)

No Impact. The project would not involve extraction of mineral resources. According to the Open Space and Conservation Element, the project site is designated Mineral Resource Zone 3 (MRZ-3), which denotes areas that contain mineral deposits whose significance cannot be evaluated from available data. However, the General Plan 2025 provides no specific policies regarding property identified as MRZ-3 and has not designated the project site for mineral resource related uses. Additionally, there is no historical use of the site or surrounding area for mineral extraction purposes. Therefore, the project would have **no impact** on mineral resources directly, indirectly or cumulatively. Further analysis of this issue in an EIR is not warranted.

b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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11b. Response (*Source: General Plan 2025 Figure OS-1 Mineral Resources, General Plan 2025 Open Space and Conservation Element, GP 2025 FPEIR Volume 2 Section 5.10 Mineral Resources*)

No Impact. The GP 2025 FPEIR determined that there are no specific areas within the City or Sphere Area that have locally-important mineral resource recovery sites and that the implementation of the General Plan 2025 would not significantly preclude the ability to extract State-designated resources. The project is consistent with the General Plan 2025. Therefore, there is **no impact** on mineral resources directly, indirectly, or cumulatively. Further analysis of this issue in an EIR is not warranted.

12. NOISE				
Would the project result in:				
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

12a. Response (*Source: GP 2025 Figure N-1 2003 Roadway Noise, Figure N-2 2003 Freeway Noise, Figure N-5 2025 Roadway Noise, Figure N-6 2025 Freeway Noise, Figure N-9 March ARB Noise Contours, Figure N-10 Noise/Land Use Noise Compatibility Criteria, GP 2025 FPEIR Table 5.11-I Existing and Future Noise Contour Comparison, Table 5.11-E Interior and Exterior Noise Standards, GP 2025 FPEIR Appendix G Noise Existing Conditions Report, Riverside Municipal Code Title 7 Noise Code, Noise Impact Analysis [Urban Crossroads 2018c]*)

Potentially Significant Impact. Noise is unwanted sound that disturbs human activity. Environmental noise levels typically fluctuate over time, and different types of noise descriptors are used to account for this variability. Noise level measurements include intensity, frequency, and duration, as well as time of occurrence. Noise level (or volume) is generally measured in decibels (dB) using the A-weighted sound pressure level (dBA). Because of the way the human ear works, a sound must be about 10 dBA greater than the reference sound to be judged as twice as loud. In general, a 3 dBA change in community noise levels is noticeable, while 1-2 dBA changes generally are not perceived. Quiet suburban areas typically have noise levels in the range of 40-50 dBA, while arterial streets are in the 50-60+ dBA range. Normal conversational levels are in the 60-65 dBA range, and ambient noise levels greater than 65 dBA can interrupt conversations.

Noise levels typically attenuate at a rate of 6 dBA per doubling of distance from point sources (such as construction equipment). Noise from lightly traveled roads typically attenuates at a rate of about 4.5 dBA per doubling of distance. Noise from heavily traveled roads typically attenuates at about 3 dBA per doubling of distance, while noise from a point source typically attenuates at about 6 dBA per doubling of distance. Noise levels may also be reduced by the introduction of intervening structures. For example, a single row of buildings between the receptor and the noise source reduces the noise level by about 5 dBA, while a solid wall or berm that breaks the line-of-sight reduces noise levels by 5 to 10 dBA. The construction style for new buildings in California generally provides a reduction of exterior-to-interior noise levels of about 30 dBA with closed windows (Federal Highway Administration [FHWA] 2017).

The Noise Element of the Riverside General Plan (2007) identifies sources of noise and provides objectives and policies designed to incorporate noise control in the planning process. To ensure different land uses are developed in compatible noise environments, the City's Noise Element establishes noise guidelines for land use planning, shown in Table 16. The Noise Element requires protection of sensitive receptors from excessive noise associated with commercial and industrial businesses and agricultural activities. During the preliminary stage of the development process, potential noise impacts and appropriate mitigation are to be identified.

The Noise Element includes specific policies to reduce noise that apply to new development:

- Policy N-1.3. Enforce that the City of Riverside Noise Control Code to ensure that stationary noise and noise emanating from construction activities, private developments/residences, and special events are minimized.
- Policy N-1.4. Incorporate noise considerations into the site plan review process, particularly with regard to parking and loading areas, ingress/egress points and refuse collection areas.

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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- Policy N-1.5. Avoid locating noise-sensitive land uses in existing and anticipated noise-impacted areas.
- Policy N-1.8. Continue to consider noise concerns in evaluating all proposed development decisions and roadway projects

Table 16 Noise/Land Use Noise Compatibility Criteria

Land Use Category	Community Noise Equivalent Level (CNEL) or Day-Night Level (Ldn), dBA			
	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Conditionally Unacceptable
Single Family Residential	60	65	70	90
Infill Residential	65	75	80	90
Commercial (Motels, Hotels, Lodging)	60	70	80	90
Schools, Libraries, Churches, Hospitals, Nursing Homes	60	70	80	90
Amphitheaters, Concert Hall, Auditorium, Meeting Hall	N/A	65	N/A	90
Sports Arenas, Outdoor Spectator Sports	N/A	70	N/A	90
Playgrounds, Neighborhood Parks	70	N/A	75	90
Golf Courses, Riding Stables, Water Rec, Cemeteries	70	N/A	80	90
Office Buildings, Business, Commercial, Professional	65	75	90	N/A
Industrial, Manufacturing, Utilities, Agriculture	70	80	90	N/A
Freeway Adjacent Commercial, Office, and Industrial Uses	65	80	90	N/A

Source: Riverside General Plan 2025 (adopted 2007)

The City of Riverside Municipal Code sets forth the City's standards, guidelines, and procedures concerning the regulation of operational noise. Specifically, Title 7, Noise Control, of the Code regulates noise levels in the City. These regulations are intended to implement the goals, objectives, and policies of the General Plan, protect the public health, safety, and welfare of the City, and to control unnecessary, excessive, and/or annoying noise in the City.

Section 7.25.010 of the Municipal Code establishes exterior noise standards for various land use categories over certain periods of time. Per the Municipal Code, noise from operations at any land use cannot exceed the exterior noise limit of another land use, as measured at the property line. City exterior noise standards are shown in Table 17.

Table 17 City of Riverside Exterior Noise Standards

Land Use Category	Time Period	Noise Level
Residential	Night (10 PM to 7 AM)	45 dBA
	Day (7 AM to 10 PM)	55 dBA
Office/Commercial	Anytime	65 dBA
Industrial	Anytime	70 dBA
Community Support	Anytime	60 dBA
Public Recreation Facility	Anytime	65 dBA

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Nonurban Anytime 70 dBA				

Source: City of Riverside Municipal Code, Table 7.25.010A

Furthermore, any noise exceeding the following is prohibited:

- The exterior noise standard of the applicable land use category, plus up to five decibels, for a cumulative period of more than thirty minutes in any hour; or
- The exterior noise standard of the applicable land use category, plus five decibels for a cumulative period of more than fifteen minutes in any hour; or
- The exterior noise standard of the applicable land use category, plus ten decibels, for a cumulative period of more than five minutes in any hour; or
- The exterior noise standard of the applicable land use category, plus fifteen decibels, for a cumulative period of more than one minute in any hour; or
- The exterior noise standard for the applicable land use category, plus twenty decibels or the maximum measured ambient noise level, for any period of time.

Per Implementation Tool N-1 of the GP 2025 Noise Element, this project has been reviewed to ensure that noise standards and compatibility issues have been addressed. A noise study was prepared for the project by Urban Crossroads in January 2018.

Exterior Noise Levels

As discussed in the Noise Study, no exterior noise mitigation is required to satisfy the City of Riverside General Plan Noise Element exterior land use/noise level compatibility criteria for residential, hotel, and commercial uses. Adjacent to SR-91, I-215, and SR-60, residential uses are shown to experience conditionally acceptable exterior noise levels of up to 61.7 dBA CNEL, hotel uses are shown to experience normally unacceptable exterior noise levels of up to 78.2 dBA CNEL, and commercial uses are shown to experience conditionally acceptable exterior noise levels of up to 65.4 dBA CNEL. Adjacent to Orange Street, commercial and residential uses are shown to experience normally acceptable and conditionally acceptable exterior noise levels, respectively. Therefore, because of the future unmitigated exterior traffic noise levels at the project site, additional interior noise analysis is required. This impact is **potentially significant**, and will be further analyzed in an EIR.

Interior Noise Levels

The Noise Study evaluated anticipated interior noise levels at the project buildings based on the City of Riverside 45 dBA CNEL residential/hotel and California Green Building Standards Code 50 dBA CNEL commercial interior noise level standards. The project buildings are shown to require a Noise Reduction (NR) of up to 33.4 dBA and a windows-closed condition requiring a means of mechanical ventilation (e.g. air conditioning). To meet the City of Riverside 45 dBA CNEL interior noise standards mitigation measures would be required to reduce interior noise levels. This impact is **potentially significant**, and will be further analyzed in an EIR.

b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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12b. Response (Source: GP 2025 Figure N-1 2003 Roadway Noise, Figure N-2 2003 Freeway Noise, Figure N-5 2025 Roadway Noise, Figure N-6 2025 Freeway Noise, Figure N-9 March ARB Noise Contours, GP 2025 FPEIR Table 5.11-G Vibration Source Levels For Construction Equipment, GP 2025 FPEIR Appendix G Noise Existing Conditions Report, Noise Impact Analysis [Urban Crossroads 2018c])

Less Than Significant Impact. Vibration is a unique form of noise because its energy is carried through buildings, structures, and the ground, whereas noise is simply carried through the air. Thus, vibration is generally felt rather than heard. The ground motion caused by vibration is measured as particle velocity in inches per second and is referenced as vibration decibels (VdB) in the U.S. The City has not adopted any thresholds or regulations addressing vibration. The vibration velocity level threshold of perception for humans is approximately 65 VdB.

The Federal Railroad Administration (FRA) provides the following thresholds for assessing ground-borne vibration impacts:

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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- 65 VdB where low ambient vibration is essential for interior operations, such as hospitals and recording studios
- 72 VdB for residences and buildings where people normally sleep, including hotels
- 75 VdB for institutional land uses with primary daytime use, such as churches and schools
- 95 VdB for physical damage to extremely fragile historic buildings
- 100 VdB for physical damage to buildings

The City of Riverside has not adopted any thresholds for construction or operational groundborne vibration impacts. However, the California Department of Transportation (Caltrans) has set vibration criteria for various land uses, as shown in Table 18.

Table 18 Caltrans Vibration Impact Criteria

Land Use Category	Vibration Impact Level for Frequent Events (VdB)¹	Vibration Impact Level for Infrequent Events (VdB)²
Building where low ambient vibration is essential for interior operations	65	65
Residences and buildings where people normally sleep	72	80
Institutional land uses with primary daytime use	75	83

¹ Frequent events are defined as more than 70 events per day.

² Infrequent events are defined as fewer than 70 events per day.

Source: Transportation and Construction Vibration Guidance Manual 2013, CalTrans

Construction-related activities, although short term, are the most common source of groundborne noise and vibration that could affect occupants present at neighboring existing buildings. The potential for noise and ground-borne vibration impacts related to noise land use compatibility, construction-related noise per GP 2025 FPEIR, Table 5.11-G, Vibration Source Levels for Construction Equipment, on-site stationary noise sources, and vehicular-related noise were analyzed in the noise study. The vibration velocity level threshold of perception for humans is approximately 65 VdB (Federal Transit Administration 2006). A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for many people. The range of interest is from approximately 50 VdB to 100 VdB. 100 VdB is the threshold where minor damage to fragile buildings may occur. The general human response to different levels of groundborne vibration velocity levels is described below in Table 19.

Table 19 Groundborne Vibration Velocity Levels

Vibration Velocity Level	Human Reaction
65 VdB	Approximate threshold of perception for many people
75 VdB	Approximate dividing line between barely perceptible and distinctly perceptible. Many people find that transportation-related vibration at this level is unacceptable.
85 VdB	Vibration acceptable only if there are an infrequent number of events per day.

Source: Federal Transit Administration, 2006

At distances ranging from 45 to 609 feet from Project construction activity, construction vibration velocity levels are shown to range from 16.4 to 79.3 VdB at the nearby sensitive receiver locations, which would remain below the Federal Transit Administration (FTA) 80 VdB threshold for sensitive receiver locations. Therefore, the vibration impacts due to project construction would be **less than significant**.

Further, vibration levels at the site of the closest sensitive receiver are unlikely to be sustained during the entire construction period but would occur rather only during the times that heavy construction equipment is operating simultaneously adjacent to the project site perimeter. Moreover, construction at the project site would be restricted to daytime hours consistent with City requirements thereby eliminating potential vibration impacts during the sensitive nighttime hours.

Table 20 Groundborne Vibration Levels from Various Types of Construction Equipment

Equipment	Approximate VdB at Nearest Receptors – 25 feet
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ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Small Bulldozer	58			
Jackhammer	79			
Loaded Trucks	86			
Large Bulldozer	87			

Source: Federal Transit Administration, 2006

The noise study concluded the project to be in compliance with FTA's vibration standards and found impacts related to groundborne vibration and groundborne noise levels as a result of the project to be a **less than significant** impact, and further analysis in an EIR is not warranted.

c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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12c. Response (Source: GP 2025 Figure N-1 2003 Roadway Noise, Figure N-2 2003 Freeway Noise, Figure N-5 2025 Roadway Noise, Figure N-6 2025 Freeway Noise, Figure N-9 March ARB Noise Contours, Figure N-10 Noise/Land Use Noise Compatibility Criteria, GP 2025 FPEIR Table 5.11-I Existing and Future Noise Contour Comparison, Table 5.11-E Interior and Exterior Noise Standards, GP 2025 FPEIR Appendix G Noise Existing Conditions Report, Riverside Municipal Code Title 7 Noise Code, Noise Impact Analysis [Urban Crossroads 2018c]), Traffic Impact Analysis [Urban Crossroads 2018d])

Potentially Significant Impact. A noise study was prepared by Urban Crossroads in January 2018 to determine whether the project would result in a permanent increase in ambient noise levels. Noise measurements, shown in the Table 21 below, were taken on August 8, 2017 during daytime and nighttime to represent the 24-hour ambient noise levels at the project site.

Table 21 Ambient Noise

#	Measurement Location	Approximate Distance to Project Boundary (feet)	Daytime Leq (dBA) ¹	Nighttime Leq (dBA) ¹
1	Located at the Fremont Elementary School across Orange Street from the project site.	220	68.6	57.2
2	Located on Orange Street at the western project site boundary near existing residential homes.	0	66.0	61.5
3	Located on Strong Street north of the project site by near existing residential homes and a church.	320	65.7	57.3
4	Located on Strong Street north of project site by near existing residential homes.	270	64.2	58.3
5	Located at the northeastern project site boundary on La Cadena drive near existing residential homes and I-215.	0	68.2	67.2
6	Located east of the project site across I-215 on Thornton Street near existing residential homes.	390	66.3	64.2
7	Located south of the project site on Russell Street near existing residential homes and commercial uses.	860	78.1	75

¹ The long-term noise readings were recorded using Piccolo Type 2 integrating sound level meter and data loggers. The Piccolo sound level meters were calibrated using a Larson-Davis calibrator, Model CAL 150. All noise meters were programmed in "slow" mode to record noise levels in "A" weighted form. The sound level meters and microphones were equipped with a windscreen during all measurements. All noise level measurement equipment satisfies the American National Standards Institute (ANSI) standard specifications for sound level meters ANSI S1.4-2014/IEC 61672-1:2013. (17)

Operational Noise

The normal activities associated with the proposed Northgate Center are anticipated to include roof-top air conditioning

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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units, entry gates, a drive-through speakerphone, car wash air blowers, residential and commercial parking lot vehicle movements, and dog park, outdoor pool/spa, RV parking, and gas station activities. Project-related operational noise would be considered significant if noise levels:

- exceed the exterior 55 dBA L50 daytime or 45 dBA L50 nighttime noise level standards for sensitive residential land uses, or 60 dBA L₅₀ for community support uses. These standards shall not be exceeded for a cumulative period of 30 minutes (L50), or plus 5 dBA cannot be exceeded for a cumulative period of more than 15 minutes (L25) in any hour, or the standard plus 10 dBA for a cumulative period of more than 5 minutes (L8) in any hour, or the standard plus 15 dBA for a cumulative period of more than 1 minute (L2) in any hour, or the standard plus 20 dBA at any time (Lmax) (City of Riverside Municipal Code, Sections 7.25.010(A)); or
- if the existing ambient noise levels at the nearby noise-sensitive receivers near the project site:
 - are less than 60 dBA L50 and the project creates a readily perceptible 5 dBA L50 or greater project-related noise level increase; or
 - range from 60 to 65 dBA L50 and the project creates a barely perceptible 3 dBA L50 or greater project-related noise level increase; or
 - already exceed 65 dBA L50, and the project creates a community noise level impact of greater than 1.5 dBA L50 (FICON, 1992).

Using the reference noise levels in Table 22, Urban Crossroads calculated that the hourly noise levels associated with the roof-top air conditioning units, entry gates, a drive-through speakerphone, car wash air blowers, residential and commercial parking lot vehicle movements, and dog park, outdoor pool/spa, RV parking, and gas station activities would range from 36.4 to 49.5 dBA L₅₀ at the sensitive off-site receiver locations.

Table 22 Reference Noise Level Measurements

Noise Source	Duration (hh:mm:ss)	Reference Distance (Feet)	Noise Source Height (Feet)	Hourly Activity (Mins)	dBA L ₅₀ at Reference Distance	dBA L ₅₀ at 50 Feet
Roof-Top Air Conditioning Unit	96:00:00	5'	5'	39	74.4	54.4
Residential Entry Gate Activity	0:04:00	40'	5'	60	52.6	50.7
Drive-Through Speakerphone	2:00:00	15'	3'	61	60.9	50.4
Car Wash Tunnel Air Blowers	0:03:04	10'	8'	62	81.6	67.6
Residential Parking Lot Vehicle Movements	1:00:00	10'	5'	63	44	33.5
Commercial Parking Lot Vehicle Movements	0:15:00	5'	5'	64	56.7	41.7
Dog Park Activity	0:15:00	5'	4'	65	58.5	38.5
Outdoor Pool/Spa Activity	0:10:00	5'	4'	66	68.7	48.7
RV Parking Lot Activity	0:01:00	10'	6'	67	76.5	66
Gas Station Activity	0:03:00	5'	5'	68	65.6	45.6
Roof-Top Air Conditioning Unit1	96:00:00	5'	5'	39	74.4	54.4

ISSUES (AND SUPPORTING FORMATION SOURCES):			Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Residential Entry Gate Activity	0:04:00	40'	5'	60	52.6	50.7

Source: Urban Crossroads 2018c.

The operational noise analysis conducted by Urban Crossroads in 2018 shows that the project-related stationary-source noise levels at one of 7 receiver locations, the residential outdoor living area located about 29 feet north of the project site on Strong Street, would exceed the City of Riverside exterior noise level standards for residential uses. Project operational noise levels would satisfy the City of Riverside Municipal Code daytime and nighttime exterior noise level standards at all other receiver locations. Due to the estimated operational noise level impacts at the residential receptor on Strong Street, this impact is **potentially significant**, and will be further analyzed in an EIR.

Off-Site Traffic Noise

The Federal Interagency Committee on Noise (FICON) (16) developed guidance to be used for the assessment of project-generated increases in noise levels that consider the ambient noise level. The FICON recommendations are based on studies that relate aircraft noise levels to the percentage of persons highly annoyed by aircraft noise. Although the FICON recommendations were specifically developed to assess aircraft noise impacts, these recommendations are often used in environmental noise impact assessments involving the use of cumulative noise exposure metrics, such as the average-daily noise level (i.e., CNEL). For example, if the ambient noise environment is quiet (<60 dBA) and the new noise source greatly increases the noise levels, an impact may occur if the noise criteria may be exceeded. Therefore, for this analysis, FICON identifies a readily perceptible 5 dBA or greater project-related noise level increase is considered a significant impact when the noise criteria for a given land use is exceeded. Per FICON, in areas where the without project noise levels range from 60 to 65 dBA, a 3 dBA barely perceptible noise level increase appears to be appropriate for most people. When the without project noise levels already exceed 65 dBA, any increase in community noise louder than 1.5 dBA or greater is considered a significant impact if the noise criteria for a given land use is exceeded, since it likely contributes to an existing noise exposure exceedance. In summary, noise impacts at noise sensitive receivers would be considered significant when noise levels at existing and future noise-sensitive receivers

- are less than 60 dBA CNEL and the Project creates a readily perceptible 5 dBA CNEL or greater Project-related noise level increase; or
- range from 60 to 65 dBA CNEL and the Project creates a barely perceptible 3 dBA CNEL or greater Project-related noise level increase;
- or already exceed 65 dBA CNEL, and the Project creates a community noise level impact of greater than 1.5 dBA CNEL (FICON, 1992).

Based on the Traffic Impact Analysis conducted by Urban Crossroads in 2018, increase in noise exposure from project-generated traffic is shown by roadway segment in Table 23.

Table 23 Project Trip Generation in Relation to Future Cumulative Conditions

Road	Segment	Adjacent Land Use	CNEL at Adjacent Land Use (dBA)			Threshold Exceeded?
			No Project	With Project	Project Addition	
Main St.	s/o Placentia Ln.	Business Park	69.7	70	0.3	No
Main St.	n/o Columbia Av.	Residential	70.1	70.3	0.3	No
Main St.	s/o Columbia Av.	Residential	69.3	69.7	0.4	No
Main St.	n/o Strong St.	Residential	68.4	68.7	0.4	No
Main St.	s/o Strong St.	Residential/School	62.1	62.3	0.2	No
Main St.	n/o Russell St.	Commercial	65.2	65.8	0.6	No
Main St.	s/o Russell St.	Residential	64.3	64.6	0.3	No
Orange St.	n/o Columbia Av.	Residential	62.2	62.4	0.2	No

ISSUES (AND SUPPORTING FORMATION SOURCES):			Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Orange St.	s/o Columbia Av.	Residential	62.9	63.5	0.7	No
Orange St.	n/o Strong St.	Residential	63.6	64.4	0.8	No
Orange St.	s/o Strong St.	Residential	64.3	65.8	1.5	No
Orange St.	n/o Russell St.	Residential	64.2	65.6	1.5	No
Orange St.	s/o Russell St.	Residential	62.2	62.8	0.6	No
Primer St.	n/o Columbia Av.	Commercial	65.9	66.3	0.4	No
La Cadena Dr.	n/o I-215 Ramps	Business Park	65	65.2	0.2	No
La Cadena Dr.	s/o I-215 Ramps	Commercial	61	63.6	2.7	No
La Cadena Dr.	n/o Strong St.	Residential	61	63.6	2.7	No
Placentia Ln.	e/o Main St.	Industrial	56.8	57	0.3	No
Columbia Av.	e/o Orange St.	Residential	67.6	67.9	0.3	No
Columbia Av.	e/o Primer St.	Commercial	70.1	70.4	0.3	No
Strong St.	w/o Main St.	Residential	57.4	58.4	1	No
Strong St.	e/o Main St.	Residential	57.1	59.1	2	No
Russell St.	e/o Main St.	Residential	60.1	62.1	2	No

Source: Urban Crossroads 2018c,d

As shown in Table 23, the project would generate a noise level increase of up to 2.7 dBA CNEL on the study area roadway segments. Based on the significance criteria discussed above, the project-related noise level increases are considered less than significant under Existing with Project conditions at the land uses adjacent to roadways conveying project traffic. There would not be a noticeable increase in traffic noise along these routes. Therefore, impacts to sensitive receptors related to increased traffic noise levels would be **less than significant**, and further analysis of this issue in an EIR is not warranted.

d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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12d. Response (Source: GP 2025 FPEIR Table 5.11-J Construction Equipment Noise Levels, GP 2025 FPEIR Appendix G Noise Existing Conditions Report, Noise Impact Analysis [Urban Crossroads 2018c])

Less Than Significant Impact. Pursuant to Municipal Code Section 7.35.020 Exemptions subsection (G), "Noise sources associated with construction, repair, remodeling, or grading of any real property; provided a permit has been obtained from the City as required; and provided said activities do not take place between the hours of 7:00 p.m. and 7:00 a.m. on weekdays, between the hours of 5:00 p.m. and 8:00 a.m. on Saturdays, or at any time on Sunday or a federal holiday." Therefore, construction noise associated with the proposed project is considered exempt from the City's Noise Ordinance. Consistent with direction from the City of Riverside Planning Department, if project construction activities occur within the permitted hours of Municipal Code, Section 7.35.010(B)(5), the construction noise levels would be considered exempt from the Municipal Code noise level standards, and therefore, the construction of the project would result in a less than significant noise impact. Standard conditions of approval will apply to the proposed project to ensure compliance with Municipal Code Section 7.35.010(B)(5).

For informational purposes, Table 24 shows the potential construction noise exposure to the nearest sensitive receptors and is further described below.

Table 24 Construction Equipment Noise

Phase	Equipment	Estimated Construction Noise	
		25 feet (dBA Lmax)	25 feet (dBA Leq)

ISSUES (AND SUPPORTING FORMATION SOURCES):		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Site Preparation	Grader, Loader, Backhoe, Scraper		91		90
Grading	Saw, Dozer, Loader, Backhoe		96		91
Building Construction	Crane, Forklift, Loader, Backhoe		87		85
Architectural Coating	Air Compressor		84		80
Paving	Concrete and Mortar Mixers, Paver, Roller, Loader, Backhoe		87		88

Source: Urban Crossroads 2018c,d

As shown in Table 24, operation of equipment during various phases of construction could generate maximum (Lmax) noise levels of approximately 76-95 dBA at the closest residences. . Since construction equipment does not always operate simultaneously and at the same distance from sensitive receptors these estimates are conservative. Equipment noise levels are based on a standard noise attenuation rate of 6 dBA per doubling of distance from the highest-volume individual pieces of equipment.

As noted above, RMC Section 7.35.010 restricts construction to between the hours of 7:00 AM and 7:00 PM on weekdays and 8:00 AM and 5:00 PM on Saturdays, and prohibits construction on Sundays and federal holidays. Construction noise could exceed acceptable noise levels of 55 dBA during the day and 45 dBA at night at the adjacent residential receptors. However, noise sources associated with permitted construction, repair, remodeling, or grading activities that comply with the Municipal Code construction hour restrictions are exempt from these noise standards pursuant to RMC Section 7.35.020.G. Since temporary and periodic noise levels from the project would not exceed or violate City of Riverside noise thresholds and because standard conditions of approval would ensure project compliance with RMC Section 7.35.020.G, this impact is **less than significant**, and further analysis of this issue in an EIR is not warranted.

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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12e. Response (Source: Riverside County Airport Land Use Compatibility Plan [RCALUCP 2015], GP 2025 Figure N-8 Riverside and Flabob Airport Noise Contours, Figure N-9 March ARB Noise Contour, Figure N-10 Noise/Land Use Noise Compatibility Criteria)

No Impact. The project site is not located in an airport land use plan area or within two miles of a public airport. The Flabob Airport is nearest to the project site, located approximately 2.5 miles southwest of the site, Riverside Municipal Airport is located approximately 5.6 miles southwest of the project site, and March Air Reserve Base/Inland Port Airport is located approximately 8.5 miles southeast. The project site is outside of the airports' influence areas in relation to noise. Therefore, the project would have **no impact** with respect to aviation-related noise levels, and further analysis of this issue in an EIR is not warranted.

f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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12f. Response (Source: GP 2025 Figure PS-6 Airport Safety Zones and Influence Areas)

No Impact. Per the GP 2025 Program FPEIR, there are no private airstrips within the City that would expose people working or residing in the City to excessive noise levels. Because the project consists of development anticipated under the GP 2025, is not located in proximity of a private airstrip, and does not entail the construction and operation of a private airstrip on the project site, the project would not expose people residing or working in the City to excessive noise levels related to a private airstrip. There would be **no impact**, and further analysis of this issue in an EIR is not warranted.

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
13. POPULATION AND HOUSING Would the project:				
a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

13a. Response (*Source: General Plan 2025 Table LU-3 Land Use Designations, GP 2025 FPEIR Volume 2 Table 5.12-A SCAG Population and Households Forecast, Table 5.12-B General Plan Population and Employment Projections 2025, Table 5.12-C 2025 General Plan and SCAG Comparisons, Table 5.12-D General Plan Housing Projections 2025, Urban Crossroads 2018b*)

Less Than Significant Impact. According to the City's General Plan estimates, population is projected to increase under the typical development scenario to 346,867 within the City limits by 2025. The proposed project would introduce a mix of multi-family residential, commercial and hotel development. Based on the CalEEMod results, the estimated population growth from the project would be 1,379 persons. In 2013, the City of Riverside had 311,955 residents. According to the General Plan 2025 EIR, the City of Riverside has a projected population of 383,077 at the ultimate buildout of the City, which equates to a population increase of 71,122. Therefore, the project is anticipated to contribute approximately 2 percent of the total anticipated regional growth.

The GP 2025 was designed to accommodate anticipated growth under the typical development scenario by providing adequate services, access, and infrastructure. Therefore, the project would result in population growth in the project area that would require new housing, roads, or other infrastructure, the project itself would provide those features or would be required to contribute fair share fees towards such projects. Therefore, the project would have a **less than significant impact**, and further analysis of this issue in an EIR is not warranted.

b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

13b, c. Response (*Source: General Plan 2025 Table LU-3 Land Use Designations, GP 2025 FPEIR Volume 2 Table 5.12-A SCAG Population and Households Forecast, GP 2025 FPEIR Volume 2 Section 5.12 Population and Housing*)

No Impact. The project site is currently vacant, and there are no existing housing units or people occupying the site. Implementation of the project would not displace any existing housing or require the construction of replacement housing, nor would it displace a substantial number of people that would trigger the need for replacement housing. The proposed project is a multi-family residential, commercial and hotel development. The residential component includes a total of 482 residential apartment units, thereby providing additional housing in the City. The project is anticipated to draw upon employees from Riverside and the surrounding area. Therefore, the project would not provide new jobs that would result in substantial population growth in the project area. The GP 2025 housing projections through 2025 would be sufficient in meeting the nominal potential increase in housing demand as a result of the project. Therefore, the project would have **no impact** on existing housing. Further analysis of this issue in an EIR is not warranted.

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
14. PUBLIC SERVICES Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

14a. Response (Source: GP 2025 FPEIR Volume 2 Table 5.13-B Fire Station Locations, Riverside Municipal Code Chapters 16.32 & 16.52)

Less Than Significant Impact. The Riverside Fire Department (RFD) provides fire protection services to the City and the project site. The closest fire station, Station 6 Northside, is located at 1077 Orange Street, approximately 1 mile north of the project site. The average on-site response time is five minutes and 30 seconds, according to the GP 2025 FPEIR. The RFD's goal is to maintain a five-minute response time for the first arriving units 90 percent of the time for all emergency medical services and fire-related incidents.

The project site is located in an urbanized area and the project entails the construction of a multi-family residential, commercial and hotel development. The proposed buildings would be constructed pursuant to the 2016 California Fire Code as adopted and amended by the City of Riverside. The buildings would include installation of automatic fire sprinkler systems in accordance with Riverside Municipal Code Chapter 16.32 (*Fire Prevention*), and would be subject to inspection and approval by the City Fire Department prior to occupancy. In addition, the payment of development fees, utilized for the purchase of land and construction of fire stations and the acquisition of equipment and furnishings to equip fire stations, would be required in accordance with Riverside Municipal Code Chapter 16.52 (Development Fees for Fire Stations). Therefore, the project would cause an incremental increase in the need for fire protection services in an area already served by the RFD, though it would not create the need for new or altered fire services. Therefore, the project has a **less than significant impact** on the demand for fire department facilities and services, and further analysis of this issue in an EIR is not warranted.

b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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14b. Response (Source: General Plan 2025 Figure PS-8 Neighborhood Policing Centers, General Plan 2025 Public Safety Element)

Less than Significant Impact. The Riverside Police Department (RPD) provides police protection services to the City and the project site. The closest RPD station is located at 3775 Fairmount Boulevard, approximately 1 mile southwest of the project site. The GP 2025 Public Safety Element strives for an average response time for priority calls within seven minutes, and within 12 minutes for second priority calls.

The project site is located in an urbanized area served by the RPD. The project entails the construction of a multi-family residential, commercial and hotel development. The project would cause an incremental increase in the need for police protection services in an area already served by the RPD, but it would not create the need for new or altered police services. Therefore, the project would have a **less than significant impact** on the demand for police department facilities and services, and further analysis of this issue in an EIR is not warranted.

c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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14c. Response (Source: GP 2025 FPEIR Volume 2 Figure 5.13-2 RUSD Boundaries, Table 5.13-D RUSD, Riverside Municipal Code Chapter 16.56)

Less than Significant Impact. The project site is located within the boundaries of the Riverside Unified School District (RUSD). Fremont Elementary School is located northwest of the project site, directly across the street at 1925 North Orange Street. The proposed project includes 482 residential apartment units would permanently increase the population by

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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approximately 1,379 people, or 2 percent of anticipated population growth. It is likely that a portion of the new population would include school age children in the area. Pursuant to Riverside Municipal Code Section 16.56.040, school impact fees shall be paid prior to the issuance of building permits for residential development. Although the project potentially increases the population of school age children in the area, the required school impact fees would offset the impact to school facilities. Therefore, the project would have a **less than significant impact** on the demand for additional school facilities or services, and further analysis of this issue in an EIR is not warranted.

d. Parks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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14d. Response (Source: GP 2025 Figure PR-1 Parks, Open Spaces and Trails, Table PR-1 Park and Recreation Facilities, Parks Master Plan 2003, GP 2025 FPEIR Table 5.14-A Park and Recreation Facility Types, and Table 5.14-C Park and Recreation Facilities Funded in the Riverside Renaissance Initiative)

Potentially Significant Impact. Parks and recreation facilities are addressed in Section 15, *Recreation* of this Initial Study. The proposed 482 residential apartment units would permanently increase the population by approximately 1,379 people, or 2 percent of anticipated population growth. Although the project would contribute a nominal increase in population, it is possible that the project could have a **potentially significant impact** on existing neighborhood and regional parks, and this issue will be further analyzed in an EIR.

e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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14e. Response (Source: General Plan 2025 Figure LU-8 Community Facilities, GP 2025 FPEIR Figure 5.13-5 Library Facilities, Figure 5.13-6 Community Centers, Table 5.3-F Riverside Community Centers, Table 5.13-H Riverside Public Library Service Standards)

Less Than Significant Impact. As discussed in Section 13, *Population and Housing*, the estimated population growth from the project would be 1,379 persons, which would permanently increase the population, thereby increasing the demand for public services in the City. However, the Riverside library system includes five neighborhood libraries that provide books, multimedia, sound recordings, magazine subscriptions, internet access and other resources. The Riverside library system also includes two cybraries that provide a collection of “virtual” materials and educational resources.

The City of Riverside Main Library is located at 3581 Mission Inn Avenue, approximately 1 mile south of the project site. The Riverside Main Library, completed in 1965, encompasses approximately 60,000 square feet and was designed to hold 300,000 items. According to the GP 2025, it holds more than 450,000 items. An expansion of library facilities is currently in the planning process to relocate the existing 60,000 square foot library and create a new 40,000 square foot library branch. The Ruth Lewis Community Center is located approximately 1 mile north of the project site. This community center is located on approximately 42 acres (Reid Park) with lighted softball fields, basketball, tennis, and lighted sports field, soccer field, community center with gym, playground, pool, picnic tables, snack bar, barbecues, restrooms and on-site parking. The project would have a **less than significant impact** on other public facilities, and further analysis of this issue in an EIR is not warranted.

15. RECREATION				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

15a. Response (Source: General Plan 2025 Figure PR-1 Parks, Open Spaces and Trails, Table PR-1 Park and Recreation Facilities, Park and Recreation Master Plan Update 2003, GP 2025 FPEIR Table 5.14-A Park and Recreation Facility Types, and Table 5.14-C Park and Recreation Facilities Funded in the Riverside Renaissance Initiative, RMC Chapter 16.60 Local Park Development Fees, RMC Chapter 16.44 Regional Parks and Reserve Parks Development Fee)

Potentially Significant Impact. As discussed in Section 13, *Population and Housing*, the estimated population growth from the project would be 1,379 persons, or 2 percent of the anticipated population growth. The City maintains 52 public parks

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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and additional open space areas encompassing more than 2,300 acres. Larger parks contain features such as sports facilities, picnic areas, restrooms and playgrounds. Smaller parks typically include basic landscaping, playgrounds and picnic facilities. The nearest park with recreational facilities is the Reid Park located approximately 1 mile north of the project site. This park is approximately 42 acres with lighted softball fields, basketball, tennis, and lighted sports fields, soccer fields, a community center with gym, playground, pool, picnic tables, snack bar, barbecues, restrooms and on-site parking. The residents of Riverside have access to an addition 12,800 acres of County and State operated park and open space land.

The City's adopted standard for developed park acreage of 3 acres per 1,000 residents would potentially be adversely affected by the increase in population from the proposed project. In accordance with RMC Chapter 16.60 and 16.44, a Local Park Development Fee and a Regional Parks and Reserve Parks Development Fee would be imposed on the future development. Alternatively, park land can be dedicated in lieu of the Local Park Development Fee if accepted by the City Council. Credits for Regional Park Fees can also be requested with the donation of land adjoining a regional park or land that is situated in a planned regional park or serve park as shown in the GP 2025.

The City of Riverside Park and Recreation Master Plan Update 2003 identified major problems with its park system such as parkland shortages, overuse of facilities, and deferred maintenance. The 2025 GP FPEIR found that without the provision of new park and recreation facilities to serve projected new residents, the population increase over time has the potential to cause increased demand for existing park and recreation facilities, thereby potentially causing further physical deterioration of existing facilities. Although the project would contribute a nominal increase in population (approximately 2 percent), it is possible that the project could have a cumulatively, **potentially significant impact** on existing neighborhood and regional parks, and this issue will be further analyzed in an EIR.

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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15b. Response (Source: Project Description)

Potentially Significant Impact. The residential component of the development incorporates a number of amenities, including two fitness centers, two outdoor pool areas, and two clubhouses, while each of the two hotels would have its own pool area. Although the project includes private recreational facilities, the increase in population has the potential to create a demand for the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Therefore, the project would have a **potentially significant impact** on the construction or expansion of recreational facilities, and this issue will be further analyzed in an EIR.

16. TRANSPORTATION/TRAFFIC				
Would the project result in:				
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

16a and 16b. Response (Source: Traffic Impact Analysis [Urban Crossroads January 19, 2018])

Potentially Significant Impact. Urban Crossroads prepared a traffic impact analysis (TIA) for the project to assess project

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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traffic impacts. The project numbers used in the traffic analysis have the potential to change as the project moves through the review process. Any changes in the project would not change the determinations herein and impacts will be further analyzed in an EIR. The traffic analysis evaluated potential project-related traffic impacts at 17 key intersections in the vicinity of the project site:

Signalized Intersections:

- Main Street & Columbia Avenue
- Main Street & Strong Street
- Main Street & SR-60 Westbound Ramps/Oakley Avenue
- Main Street & SR-60 Eastbound Ramps
- Orange Street & Columbia Avenue
- Primer Street & Columbia Avenue
- E La Cadena Drive & Columbia Avenue

Unsignalized Intersections:

- Main Street & Placentia Lane
- Main Street & Russell Street
- Orange Street & Strong Street
- Orange Street & Driveway 1
- Orange Street & Driveway 2 – Future Intersection
- Orange Street & Oakley Avenue/SR-60 Westbound Off-Ramp
- Orange Street & Russell Street
- W. La Cadena Drive & Interchange Street/I-215 Southbound Ramps
- W. La Cadena Drive/Driveway 3 & Strong Street
- E La Cadena Drive & I-215 Northbound Ramps

A Level of Service (LOS) A through D is considered acceptable for roadway segments, according to the City's Roadway Capacity Exhibit D in the City of Riverside's *Traffic Impact Analysis Preparation Guide* (2016c). The TIA determined that all project area intersections currently operate at LOS D or better during the AM and PM peak hours, with the exception of the following:

- Orange Street & Oakley Avenue/SR-60 Westbound Ramps – LOS E during PM Peak Hour
- W. La Cadena Drive & Interchange Street/I-215 Southbound Ramps – LOS E during PM Peak Hour
- E. La Cadena Drive & I-215 Northbound Ramps – LOS F during AM/PM Peak Hours

These three intersections would continue to operate below acceptable levels of service with the addition of project traffic.

Trip generation for the project was estimated using trip generation rates for Multifamily Housing Low Rise (item 220), Hotel (item 310), Shopping Center (item 820), High Turnover Sit-Down Restaurant (item 932), Fast Food Restaurant with Drive-Through Window (item 934), and Gas Station with Convenience Market (item 945) provided in the Institute of Transportation Engineers *Trip Generation Manual*, 10th Edition. The project would generate an estimated total of 10,366 new daily trips with 701 net trips during the AM peak hour and 900 net trips during the PM peak hour. It is anticipated that many project-generated trips would occur outside of peak traffic periods. The City requires mitigation if project traffic would deteriorate roadway LOS to below target LOS E. Table 25 details Existing + Project traffic volumes and impacts.

Table 25 Existing + Project Traffic Volumes

Intersection	Existing Delay	Existing LOS	Existing + Project Delay	Existing + Project LOS	Impact	Change in Delay
Riverside Ave/Main St & Placentia Lane	17.4	C				1.5

ISSUES (AND SUPPORTING FORMATION SOURCES):				Potentially Significant Impact		Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
	AM Peak	20.7	C	18.9	C	NO	5.6	
	PM Peak			26.3	D	NO		
Main St & Columbia Ave	AM Peak	19.6	B	20.2	C	NO	0.6	
	PM Peak	21.6	C	22.1	C	NO	0.5	
Main St & Strong St	AM Peak	31.8	C	39.4	D	NO	7.6	
	PM Peak	12.3	B	51.5	D	YES	39.2	
Main St & SR-60 WB On-Ramp/Oakley Ave	AM Peak	23.1	C	24.5	C	NO	1.4	
	PM Peak	29.5	C	33.7	C	NO	4.2	
Main St & SR-60 EB Ramps	AM Peak	16.3	B	16.6	B	NO	0.3	
	PM Peak	18.6	B	22.9	C	NO	4.3	
Main St & Russell St	AM Peak	14.2	B	16.6	C	NO	2.4	
	PM Peak	17.4	C	21.9	C	NO	4.5	
Orange St & Columbia Ave	AM Peak	13.0	B	13.4	B	NO	0.4	
	PM Peak	15.3	B	16.6	B	NO	1.3	
Orange St & Strong St	AM Peak	10.8	B	13.5	B	NO	2.7	
	PM Peak	17.0	C	37.5	E	YES	20.5	
Orange St & Driveway 1	AM Peak	14.4	B	16.4	B	NO	2.0	
	PM Peak	12.7	B	20.8	C	NO	6.1	
Orange St & Driveway 2	AM Peak	Future intersection		10.2	B	NO	--	
	PM Peak			12.0	B	NO	--	
Orange St & Oakley Ave/SR-60 WB Off-Ramp	Existing Lanes: AM Peak	19.2	C	33.3	D	YES	14.1	
	PM Peak	38.9	E	111.1	F	YES	72.2	
	Proposed Lanes: AM Peak	19.2	C	77.2	F	YES	58.0	
	PM Peak	38.9	E	106.6	F	YES	67.7	
Orange St & Russell St	AM Peak	14.3	B	21.2	C	NO	6.9	
	PM Peak	14.4	B	24.5	C	NO	10.1	
Primer St & Columbia Ave	AM Peak	12.7	B	13.2	B	NO	0.5	
	PM Peak	14.2	B	15.3	B	NO	1.1	
W. La Cadena Dr & Interchange St/I-215 SB Ramps	AM Peak	25.2	D	32.3	D	NO	7.1	
	PM Peak	35.1	E	50.4	F	YES	15.3	
W. La Cadena Dr/Driveway 3 & Strong St	Future Intersection					NO	--	

ISSUES (AND SUPPORTING FORMATION SOURCES):				Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
AM Peak				8.0	A	NO	--
PM Peak				8.9	A		
E. La Cadena Drive & I-215 NB Ramps							
AM Peak		61.0	F	94.0	F	YES	33.0
PM Peak		91.1	F	141.4	F	YES	50.3
E La Cadena Dr & Columbia Ave							
AM Peak		38.2	C	41.8	D	NO	3.6
PM Peak		20.2	C	22.0	C	NO	1.8

Notes: Delay is measured in seconds; LOS = Level of Service
Source: Adapted from Table 5-1, Urban Crossroads 2018

For Existing plus Project conditions, the Orange Street/Strong Street and Orange Street/Driveway 1 intersections are anticipated to meet traffic signal warrants based on the peak hour volume warrants. The Riverside Avenue/Main Street at Placentia Lane and Main Street/Russell Street intersections would operate below acceptable LOS, but do not meet the signal warrant. Again, the project numbers used in the traffic analysis have the potential to change as the project moves through the review process. This impact is **potentially significant** and minor changes in the project traffic numbers would not change the determination; impacts will be further analyzed in an EIR.

The TIA presented a list of cumulative projects within 1.5 miles of the project in order to determine cumulative impacts from anticipated existing + cumulative + opening year (2019) project traffic volumes. Table 26 detailed the anticipated traffic volumes.

Table 26 Existing + Cumulative + Opening Year Project Traffic Volumes

Intersection	2019 Without Project Delay	2019 Without Project LOS	2019 + Project Delay	2019 + Project LOS	Impact	Change in Delay
Riverside Ave/Main St & Placentia Lane						
AM Peak	21.0	C	23.3	C	NO	2.3
PM Peak	34.0	D	46.6	E	YES	12.6
Main St & Columbia Ave						
AM Peak	20.1	C	20.9	C	NO	0.8
PM Peak	22.6	C	23.1	C	NO	0.5
Main St & Strong St						
AM Peak	37.7	D	45.6	D	NO	7.9
PM Peak	66.7	E	80.2	F	YES	13.5
Main St & SR-60 WB On-Ramp/Oakley Ave						
AM Peak	23.3	C	24.8	C	NO	1.5
PM Peak	29.3	C	34.2	C	NO	4.9
Main St & SR-60 EB Ramps						
AM Peak	16.5	B	16.8	B	NO	0.3
PM Peak	19.3	B	23.5	C	NO	4.2
Main St & Russell St						
AM Peak	14.8	B	17.8	C	NO	3.0
PM Peak	18.7	C	24.3	C	NO	5.6
Orange St & Columbia Ave						
AM Peak	13.3	B	13.7	B	NO	0.4
PM Peak	16.4	B	17.9	B	NO	1.5

ISSUES (AND SUPPORTING FORMATION SOURCES):				Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Orange St & Strong St	AM Peak	11.4	B	15.2	C	NO	3.8
	PM Peak	25.2	D	62.3	F	YES	37.1
Orange St & Driveway 1	AM Peak	15.1	C	16.9	B	NO	1.8
	PM Peak	13.5	B	22.2	C	NO	8.8
Orange St & Driveway 2	AM Peak	Future intersection		10.3	B	NO	--
	PM Peak			12.3	B	NO	--
Orange St & Oakley Ave/SR-60 WB Off-Ramp	Existing Lanes: AM Peak	21.5	C	39.5	E	YES	18.0
	PM Peak	55.3	F	135.3	F	YES	80.0
	Proposed Lanes: AM Peak	21.5	C	90.4	F	YES	68.9
	PM Peak	55.3	F	133.1	F	YES	77.8
Orange St & Russell St	AM Peak	15.8	B	24.5	C	NO	8.7
	PM Peak	16.8	C	35.0	D	NO	18.2
Primer St & Columbia Ave	AM Peak	13.1	B	13.9	B	NO	0.8
	PM Peak	15.2	B	16.4	B	NO	1.2
W. La Cadena Dr & Interchange St/I-215 SB Ramps							
	AM Peak	28.8	D	37.7	E	YES	8.9
	PM Peak	45.4	E	65.3	F	YES	19.9
W. La Cadena Dr/Driveway 3 & Strong St	AM Peak	Future Intersection		8.0	A	NO	--
	PM Peak			9.0	A	NO	--
E. La Cadena Drive & I-215 NB Ramps	AM Peak	70.7	F	111.0	F	YES	40.3
	PM Peak	117.5	F	189.5	F	YES	72.0
E La Cadena Dr & Columbia Ave	AM Peak	41.8	D	45.5	D	NO	3.7
	PM Peak	21.2	C	23.3	C	NO	2.1

Notes: Delay is measured in seconds; LOS = Level of Service
Source: Adapted from Table 6-1, Urban Crossroads 2018

Many of the studied intersections would operate at unacceptable LOS during AM and PM peak hours. Again, the project details used in the traffic analysis have the potential to change as the project moves through the review process. This impact is **potentially significant** and minor changes in the projected operational date would not change the **potentially significant impact** of the project; impacts will be further analyzed in an EIR.

c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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16c. Response (Source: Riverside County Airport Land Use Compatibility Plan [RCALUCP 2015])

No Impact. The project site is not located within any airport land use plan area or within two miles of a public airport. The Flabob Airport is nearest to the project site, located approximately 2.5 miles southwest of the site, Riverside Municipal Airport is located approximately 5.6 miles southwest of the project site, and March Air Reserve Base/Inland Port Airport is

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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located approximately 8.5 miles southeast. The project site is outside of the airports' influence areas and the proposed building would not encroach into air traffic space. This project would have no effects on demand for local air service or volumes of air traffic and would not alter air traffic patterns. There would be **no impact**, and further analysis in an EIR is not warranted.

d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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16d. Response: (*Source: Project Site Plans, TIA [Urban Crossroads, January 2018d]*)

Less Than Significant Impact. The proposed development would be accessible via two main driveways located on Orange Street, and a secondary access point at the southern terminus of La Cadena Drive at Strong Street. Of the two Orange Street driveways, one would provide full access, while the other would provide right-in/right-out access only. Internally, the project would provide a series of streets and drive aisles that would accommodate vehicular access throughout the entire project site. The internal streets would be connected by a four-way stop intersection located towards the middle of the project site. The project would comply with California Building Code standards and would not include any design features that would increase circulation hazards. Operation of a mixed residential, commercial and hotel project would not result in roadway uses that would be incompatible with the existing land uses surrounding the area. The project would not result in any changes to the lane or street configuration of Strong Street. The project would however, extend the southern terminus of La Cadena Drive onto the project site, to the future intersection located towards the middle of the project site. The project is also anticipated to require the expansion of the exit ramp from SR 60 at Orange Street to allow for a right-turn-only lane and the addition of a northbound lane to Orange Street along the western project boundary. These changes would not affect the overall configuration or accessibility of area roadways, nor impact the performance or safety of alternative transportation modes. Therefore, the project would have a **less than significant impact** on roadways and roadway hazards, and further analysis of this issue in an EIR is not warranted.

e. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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16e. Response (*Source: CalTrans Highway Design Manual, RMC, and 2016 California Fire Code*)

Less Than Significant Impact. The project site would be accessible via two driveways on Orange Street and an extension of La Cadena Drive. The project plan sets currently do not provide details on the widths of any driveways, internal roadways, or drive aisles. However, per RMC Section 16.32.290, the City requires a 12-foot minimum width for fire apparatus access roads. Per RMC Section 18.210.030(F), that the minimum turn area radius for fire access is 36 feet, provided at the end of cul-de-sacs and dead-end streets. The proposed buildings would be constructed pursuant to the 2016 California Fire Code as adopted and amended by the City of Riverside. The buildings would include installation of automatic fire sprinkler systems in accordance with Riverside Municipal Code Chapter 16.32 (*Fire Prevention*). The Conceptual Fire Plan provided by the applicant, the building designs, and the access and circulation roadways, would all be subject to inspection and approval by the City Fire Department prior to occupancy. The project would have a **less than significant impact** on emergency access, and further analysis of this issue in an EIR is not warranted.

f. Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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16f. Response (*Source: GP 2025 FPEIR, GP 2025 Land Use and Urban Design Element, GP Circulation and Community Mobility and Education Elements, City of Riverside Bicycle Master Plan*)

Less Than Significant Impact. The project site and surrounding area are served by pedestrian and bicycle facilities. There are Riverside Transit Agency public transit stops along Main Street, approximately 650 feet west of the project site, and on Russell Street, approximately 1,100 feet southwest of the project site. Sidewalks are currently located on the western side of Orange Street and northern side of Oakley Avenue; however, there are currently no sidewalks adjacent to the project site. Class II bicycle lanes and sidewalks exist on both sides of Spruce Street, and there is a Park & Ride facility located approximately 600 feet from the project site, just south of State Route 60. The project would include an additional northbound lane on Orange Street from SR 60 to the project entrance, and the project would extend the southern terminus of

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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La Cadena Drive onto the project site, to the future four-way intersection located towards the middle of the project site. This change would not affect the overall configuration or accessibility of Orange Street or La Cadena Drive, nor impact the performance or safety of alternative transportation modes. Therefore, the project would have a **less than significant impact** with respect to adopted policies, plans, or programs supporting alternative transportation, and further analysis of this issue in an EIR is not warranted.

17. TRIBAL CULTURAL RESOURCES				
Would the project:				
a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in a Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 2024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significant of the resource to a California Native American tribe.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

17.a.i. and a.ii. Response (Source: GP 2025 and GP 2025 FPEIR Figure 5.5.-2 Prehistoric Cultural Resources Sensitivity, Cultural Resources Survey [Rincon Consultants 2017a])

Potentially Significant Impact. Chapter 532, Statutes of 2014 (i.e., Assembly Bill [AB] 52), requires Lead Agencies evaluate a project's potential to impact "tribal cultural resources." Such resources include "[s]ites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources." AB 52 also gives Lead Agencies the discretion to determine, supported by substantial evidence, whether a resource qualifies as a "tribal cultural resource." Per AB 52, Native American consultation is required upon request by a California Native American tribe that has previously requested that the City provide it with notice of such projects.

The project site is undeveloped, however it is located in a developed area, adjacent to residential and commercial uses. As discussed in Section 5, *Cultural Resources*, there is potential for development of the project to disturb cultural resources. To date, AB 52 consultation between the City of Riverside and Native American tribes has not occurred. The project is also proposing land use changes through General Plan amendments and would require compliance with SB18 regulations. The origin of potential resources is unknown, and therefore, there is potential for the resources of tribal or Native American importance to be impacted during project development. Due to the potential to impact culturally sensitive resources in the area, this impact is **potentially significant**, and will be further analyzed in an EIR.

18. UTILITIES AND SYSTEM SERVICES				
Would the project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

18a. Response (Source: GP 2025, California Regional Water Quality Control Board – Santa Ana Region)

Less than Significant Impact. The City of Riverside's Regional Water Quality Control Plant is subject to Waste Discharge

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Requirements for Order No. R8-2013-0016, NPDES No. CA0105350, and the Western Riverside County Regional Wastewater Authority (WRCRWA) facility are subject to Order No. R8-2015-0013 NPDES No. CA8000316. NPDES permits are administered by the State Regional Water Quality Control Board (RWQCB). This type of NPDES permit includes requirements that implement the Water Quality Control Plan (Basin Plan), which was adopted by the RWQCB on March 11, 1994. The Basin Plan identifies water quality objectives and beneficial uses for the Santa Ana River and its tributaries; and the subsequent NPDES permits indicate specific waste discharge requirements for individual permittees.

The project would be required to comply with all provisions of the NPDES program, as enforced by the RWQCB. Therefore, implementation of the project would not exceed applicable wastewater treatment requirements of the RWQCB with respect to discharges to the sewer system or stormwater system within the City. The project would be required to adhere to the General Plan Public Facilities and Infrastructure Element Policy (PF-3.4) which requires minimal adverse effects to water quality from sanitary sewer outflows. Development of the project would be required to adhere to existing regulations and the proposed policies identified above. Therefore, impacts would be **less than significant**, and further analysis of this issue in an EIR is not warranted.

b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

18b, e. Response (Source: GP 2025 Figure PF-2 Sewer Facilities Map, GP 2025 FPEIR Figure 5.16-5 Sewer Service Areas, City of Riverside Public Utilities Department 2015 Urban Water Management Plan)

Potentially Significant Impact. According to FPEIR Figure 5.16-5, the City of Riverside Public Works (PW) Department provides sewer service to the project site. The City of Riverside PW Department collects, treats, and disposes wastewater at the project site through the Riverside Regional Water Quality Control Plant (RRWQCP), and complies with state and federal requirements governing the treatment and discharge of wastewater. The wastewater collection system has over 776 miles of gravity sewers that range in size from six to 54 inches in diameter and includes 18 wastewater pump stations. In 2015, RRWQCP's plant capacity was expanded to 46 million gallons per day (mgd) (Riverside, City of 2016b). The RRWQCP serves approximately 295,000 people, who generate approximately 18 mgd. Therefore, the RRWQCP currently has excess capacity.

Wastewater flows associated with the proposed project would consist of substances typically generated by commercial, residential, and hotel use, as no industrial production activities would occur on site. Sewer connection fees would be determined per RMC Section 14.08.080. The project is anticipated to contribute approximately 2 percent of the total anticipated regional growth, which would contribute a nominal amount of additional wastewater, well within the capacity of the existing system. Demands for wastewater treatment would be **less than significant**, and further analysis of this issue in an EIR is not warranted.

c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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18c. Response (Source: GP 2025 FPEIR Figure 5.16-2 Drainage Facilities)

Potentially Significant Impact. The Riverside County Flood Control and Water Conservation District currently operates an above ground wash drain that runs east/west across the site. RMC Section 18.240.020 requires drainage fees to be paid to the City for new construction, which are then transferred into a drainage facilities fund maintained by the Riverside County Flood Control and Water Conservation District and compliant with California Government Code Section 66483.

Existing topography of the site has rolling hills, which naturally drains into the on-site drainage wash. There are currently no impervious surfaces on site, as the site is undeveloped and consists of vegetation and trees. Development on-site would

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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increase the amount of impervious surfaces, and alter the existing drainage on-site. The project plans for on-site stormwater to drain into the above ground wash that currently exists on-site, as well as routing run off to street drains via gutters and inlets. The location and capacity of the drainage facilities required to service the project are currently unknown. This impact is **potentially significant** and will be further analyzed in an EIR.

d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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18d. Response (Source: GP 2025 FPEIR Figure 5.16-3 Water Service Areas, Figure 5.16-4 Water Facilities, City of Riverside Public Utilities Department 2015 Urban Water Management Plan)

Potentially Significant Impact. The project site is served by RPU, which supplied 74,928 acre feet (24,415 million gallons) of water to 295,000 people within its service area in 2015. The RPU Department's 2015 Urban Water Management Plan plans on supplying 124,703 acre feet (40,634 million gallons) of water by 2040 to meet increasing demand under anticipated buildout from GP 2025.

Implementation of the project would construct commercial and residential buildings, a gas station, and two hotels. The introduction of these uses on the existing vacant lot would generate additional demand for water supplies in the City of Riverside. Due to the magnitude of the project, there is currently unknown water demands required to service the project. The City of Riverside Development Review Committee reviewed the project in February 2018, and during their completeness review, required the preparation of a Water Supply Assessment. Once the Assessment has been completed, a review of available water supplies would be conducted, which would determine if water supplies are available, or if new or expanded entitlements are needed. This impact is **potentially significant**, and will be further analyzed in an EIR.

f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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18f. Response (Source: GP 2025 FPEIR Table 5.16-A Existing Landfills and Table 5.16-M Estimated Future Solid Waste Generation from the Planning Area, GP 2025 Public Facilities and Infrastructure Element, Urban Crossroads 2018b)

Less Than Significant Impact. The City of Riverside Public Works Department collects trash from 70 percent of Riverside households and the remainder is collected by private contractors. According to Public Resources Code Section 41780, the City must divert at least 50 percent of the waste generated from landfills. GP Policy PF-5.1 states waste should be diverted from landfills and that the City should achieve 100 percent recycling citywide for both residential and non-residential development.

The majority of Riverside waste in 2016 went to the Badlands Sanitary Landfill (333,491 tons) and the El Sobrante Landfill (36,326 tons; CalRecycle 2017c). The Badlands Sanitary Landfill, located in Moreno Valley, has a permitted daily capacity of 4,800 tons, a permitted total capacity of 34,400,000 cubic yards, and a remaining capacity of 15,748,799 cubic yards. The landfill is projected to close in 2022 (CalRecycle 2017a). The El Sobrante Landfill, located in Corona, has a permitted daily capacity of 16,054 tons, a permitted total capacity of 184,930,000 tons, and a remaining capacity of 145,530,000 tons. It is projected to close in 2045 (CalRecycle 2017b).

The project would not require any demolition as the site is currently undeveloped and vacant. Therefore, no demolition debris would be generated. The project would generate both construction and operational solid waste, which would be disposed of at the aforementioned landfills. Based on the modeling results from CalEEMod, the project is estimated to generate approximately 674 tons of solid waste per year, which represents approximately 0.2 percent of the total solid waste sent to landfills from Riverside each year. This impact is **less than significant** and further analysis of this issue in an EIR is not warranted.

g. Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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18g. Response (Source: GP 2025 Public Facilities and Infrastructure Element)

No Impact. The California Integrated Waste Management Act under Public Resource Code 41780 requires that local

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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jurisdictions divert at least 50% of all solid waste generated. The City of Riverside currently achieves this rate (City of Riverside 2013). The City remains committed to continuing its existing waste reduction and minimization efforts with the programs that are available through the City (ex. Green Waste Collection, Curbside Recycling, Household Hazardous Waste, Clean Up Riverside's Environment). Implementation of the proposed project would not conflict with any Federal, State, or local regulations related to solid waste. There would be **no impact**, and further analysis of this issue in an EIR is not warranted.

19. MANDATORY FINDINGS OF SIGNIFICANCE				
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or an endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

19a. Response (*Source: Source: MSHCP Consistency Analysis and Habitat Assessment [Rincon Consultants 2017b, USFWS National Wetlands Inventory [USFWS 2017], GP 2025 Figure OS-7 MSHCP Cores and Linkage, Box Springs Mountain Reserve Comprehensive Trails Master Plan, GP 2025 FPEIR Figure 5.5-1 Archaeological Sensitivity and Figure 5.5-2 Prehistoric Cultural Resources Sensitivity and Appendix D, Cultural Resources Survey [Rincon Consultants 2017a]*)

Potentially Significant Impact. The site is currently undeveloped site with naturally occurring habitat. Therefore, implementation of this project would have potentially significant effects on the quality of the environment, habitat of fish and wildlife, fish and wildlife populations, plant or animal communities, and/or the range of endangered species. As discussed in Section 4, *Biological Resources*, there is potential for the project to impact sensitive species and habitat. As discussed in Section 5, *Cultural Resources*, there is potential for the project to adversely affect archeological, paleontological resources, which may be present on site. The potential remains for encountering such resources during ground disturbing activities, and impacts will be further analyzed in an EIR. Since there is the potential to eliminate important examples of major periods of California history or prehistory, these impacts are **potentially significant**, and will be further analyzed in an EIR.

b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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19b. Response (*Source: FPEIR Section 6 Long-Term Effects/ Cumulative Impacts for the GP 2025 Program*)

Potentially Significant Impact. The project would include the construction of commercial and residential properties, a gas station, and two hotels on a vacant site. Implementation of the project, in conjunction with other projects in the surrounding area, may result in impacts that are cumulatively considerable. In addition, impacts directly associated with buildout of the proposed project have the potential to be cumulatively considerable. The impacts with potentially significant cumulative adverse effects include aesthetics, air quality, cultural resources, greenhouse gas emissions, noise, traffic and circulation, and utilities and service systems. Cumulative impacts of the proposed project would be **potentially significant** and will be further analyzed in an EIR.

c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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19c. Response (*Source: FPEIR Section 5 Environmental Impact Analysis for the GP 2025 Program*)

Potentially Significant Impact. The project would include the construction of commercial and residential properties, a gas

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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station, and two hotels on a vacant site and would largely affect disturbed/developed lands within the City of Riverside. Potential effects of the project on human beings (e.g. air quality, geology and soils, hydrology and water quality, noise, and traffic) have been evaluated herein within this Initial Study. Impacts resulting with the project have been found to be potentially significant. Based on the above analysis and the conclusions identified in this Initial Study, the project would have the potential to cause substantial adverse effects, directly or indirectly, to human beings. Therefore, this issue is **potentially significant**, and will be further analyzed in an EIR.

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Staff Recommended Mitigation Measures

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party	Monitoring/Reporting Method